

ESTTA Tracking number: **ESTTA749044**

Filing date: **05/29/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92060029
Party	Defendant Melvin N.A. Avanzado DBA The Avanzado Law Firm
Correspondence Address	ELAINE W YU THE AVANZADO LAW FIRM 1880 CENTURY PARK E, STE 1404 LOS ANGELES, CA 90067 UNITED STATES elaine@avanzadolaw.com, mel@avanzadolaw.com
Submission	Defendant's Notice of Reliance
Filer's Name	Elaine Yu
Filer's e-mail	elaine@avanzadolaw.com, mel@avanzadolaw.com
Signature	/Elaine Yu/
Date	05/29/2016
Attachments	2016-05-29 Notice of Reliance and Exhs 1-17 FINAL.pdf(5648635 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**  
**BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JAHN & ASSOCIATES, LLC

Petitioner,

v.

MELVIN N.A. AVANZADO,

Registrant/Respondent.

**CANCELLATION NO.: 92060029**

MARK: BIG FIRM EXPERIENCE,  
SMALL FIRM SERVICE  
(Registration Number: 4015965)

Filing Date: February 1, 2011

**RESPONDENT MELVIN N.A. AVANZADO'S NOTICE OF RELIANCE**  
**PURSUANT TO TRADEMARK TRIAL AND APPEAL BOARD MANUAL OF**  
**PROCEDURE SECTIONS 702 & 704**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Respondent Melvin N.A. Avanzado ("Avanzado") hereby submits this Notice of Reliance pursuant to Trademark Trial and Appeal Board Manual of Procedure ("TBMP") Sections 704.02 through 704.10. Furthermore, pursuant to the parties' March 29, 2016 Stipulation for Testimony via Affidavit – which was accepted on April 7, 2016 – Avanzado submits the declaration of Melvin N.A. Avanzado along with the evidence he will rely upon at trial. Specifically, Avanzado gives notice that he will rely on the following items as evidence.

**OFFICIAL RECORDS – TBMP § 704.07**

<b>Exhibit No.</b>	<b>Document Description</b>	<b>Relevance</b>
1.	Respondent’s August 23, 2011 Certificate of Registration Number 4,015,965 for the mark BIG FIRM EXPERIENCE...SMALL FIRM SERVICE	This trademark registration is the subject of the instant cancellation proceedings. The registration certificate establishes when the trademark received federal protection.
2.	Respondent’s February 2, 2011 application for trademark registration serial number 85/231,879 for the mark BIG FIRM EXPERIENCE...SMALL FIRM SERVICE	This is the underlying application for registration number 4,015,965 that also shows when Respondent filed for trademark registration.
3.	June 7, 2011 communication from the United States Patent & Trademark Office Trademark Electronic Application System to glenn@mycontractsguy.com to inform Respondent that Respondent’s trademark contained in application serial number 85/231,879 has been published in the <i>Trademark Official Gazette</i> .	This communication concerns the publication of Respondent’s trademark in application serial number 85/231,879 and is relevant to Petitioner’s failure to oppose Respondent’s trademark registration.
4.	Petitioner’s June 23, 2009 Certificate of Registration Number 3,642,830 for the mark SMALL FIRM, BIG EXPERIENCE	This is Petitioner’s trademark that Petitioner claims has a likelihood of being confused with Respondent’s registered mark “BIG FIRM EXPERIENCE...SMALL FIRM SERVICE.”
5.	Petitioner’s November 13, 2008 application for trademark registration serial number 77/613,824 for the mark SMALL FIRM, BIG EXPERIENCE	The underlying application for Petitioner’s mark (registration number 3,642,830).

6.	Petitioner's September 23, 2014 petition for cancellation number 92,060,029 to cancel the registered mark BIG FIRM EXPERIENCE...SMALL FIRM SERVICE	Petitioner's cancellation petition subjecting Respondent's BIG FIRM EXPERIENCE...SMALL FIRM SERVICE mark to cancellation proceedings
7.	Search results dated May 31, 2011 (bates-stamped JA 35) from the United States Patent & Trademark Office Trademark Electronic Search System concerning Respondent's registered mark, BIG FIRM EXPERIENCE...SMALL FIRM SERVICE.	This document supplements and corroborates Petitioner's response to Interrogatory numbers 5 & 6 concerning when Petitioner first learned of Respondent's registered trademark.

**PETITIONER'S INTERROGATORY ANSWERS – TBMP § 704.10**

<b>Exhibit No.</b>	<b>Document Description</b>	<b>Relevance</b>
8.	Petitioner's responses to Respondent's first set of Requests for Admission	Petitioner's responses to Respondent's Requests for Admissions Numbers 5, 6 & 7 are relevant to the <i>Du Pont</i> factors regarding trade and marketing channels; the sophistication of the targeted consumers; the extent of potential confusion; and the relatedness of the goods and services.
9.	Petitioner's responses to Respondent's first set of Interrogatories	Petitioner's responses to Respondent's Interrogatories Numbers 1-4 are relevant to the <i>Du Pont</i> factors regarding trade and marketing channels; the sophistication of the targeted consumers; the extent of potential confusion; and the relatedness of the goods and services. Petitioner's responses to Respondent's

Exhibit No.	Document Description	Relevance
		Interrogatories numbers 5 & 6 are relevant to when Petitioner allegedly first learned of Respondent's registered trademark and when Petitioner took action to protect its mark.
10.	Petitioner's responses to Respondent's second set of Interrogatories	Petitioner's responses to Respondent's Interrogatories numbers 15-17 are relevant to the <i>Du Pont</i> factors regarding trade and marketing channels; the sophistication of the targeted consumers; the extent of potential confusion; and the relatedness of the goods and services. Response number 22 is relevant to the <i>Du Pont</i> factors regarding actual confusion and the extent of potential confusion.

**INTERNET DOCUMENTS & OTHER PRINTED MATERIALS – TBMP § 704.08 (b-c)**

Exhibit No.	Document Description	Relevance
11.	Petitioner's website from the following website address: <a href="http://jahnlaw.com">http://jahnlaw.com</a> .	This document is relevant to the <i>Du Pont</i> factors regarding the similarity of the marks in their entireties; the fame of the prior mark; the nature and extent of any actual confusion; the variety of goods on which the mark is used; and the extent of potential confusion.

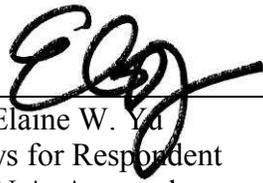
12.	Websites of third-party law firms that use variations of the mark and saying “SMALL FIRM, BIG EXPERIENCE”	These documents are relevant to the <i>Du Pont</i> factors regarding the similarity of the marks in their entireties; the fame of the prior mark; the nature and extent of any actual confusion; the variety of goods on which the mark is used; and the extent of potential confusion.
-----	---	---

**TESTIMONY VIA AFFIDAVIT– 37 CFR 2.123(b)**

<b>Exhibit No.</b>	<b>Document Description</b>	<b>Relevance</b>
13.	Declaration of Melvin N.A. Avanzado dated May 27, 2016	To authenticate documents in Exhibits 11 through 16
14.	Respondent’s prototypes of the mark BIG FIRM EXPERIENCE...SMALL FIRM SERVICE	These documents are relevant to Respondent’s state of mind when he created the trademark.
15.	June 7, 2011 communication from the United States Patent and Trademark Office to Respondent regarding the publication of the mark BIG FIRM EXPERIENCE...SMALL FIRM SERVICE	This document shows when Respondent’s mark was published for opposition and the period when Petitioner could have opposed the registration of the mark.
16.	Petitioner’s June 24, 2014 cease and desist letter from Petitioner to Respondent regarding Respondent’s registered mark BIG FIRM EXPERIENCE...SMALL FIRM SERVICE	This document shows when Petitioner first contacted Respondent about his alleged infringing activity.
17.	Declaration of Kelly D. Talcott dated April 21, 2016	This document is relevant to lack of actual confusion and the extent of potential confusion.

DATED: May 29, 2016

THE AVANZADO LAW FIRM

By:  \_\_\_\_\_  
Elaine W. Yu  
Attorneys for Respondent  
Melvin N.A. Avanzado

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing RESPONDENT AND DEFENDANT MELVIN N.A. AVANZADO'S NOTICE OF RELIANCE has been served on Kirstin M. Jahn by delivering said copy on May 29, 2016, via electronic mail – pursuant to the parties' agreement – to:

Kirstin@jahnlaw.com  
Kirstin M. Jahn  
Jahn & Associates, LLC  
1942 Broadway, Suite 314  
Boulder, Colorado 80304

Signature   
Date May 27, 2016

# EXHIBIT 1

# United States of America

United States Patent and Trademark Office

## BIG FIRM EXPERIENCE...SMALL FIRM SERVICE

**Reg. No. 4,015,965**

**Registered Aug. 23, 2011**

**Int. Cl.: 45**

**SERVICE MARK**

**PRINCIPAL REGISTER**

MELVIN N.A. AVANZADO (CALIFORNIA SOLE PROPRIETORSHIP), DBA THE AVANZADO  
LAW FIRM  
1880 CENTURY PARK EAST, SUITE 1404  
LOS ANGELES, CA 90067

FOR: LITIGATION SERVICES, IN CLASS 45 (U.S. CLS. 100 AND 101).

FIRST USE 3-1-2008; IN COMMERCE 3-1-2008.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

SER. NO. 85-231,879, FILED 2-1-2011.

MICHAEL WIENER, EXAMINING ATTORNEY



*David J. Kyjars*

Director of the United States Patent and Trademark Office

**REQUIREMENTS TO MAINTAIN YOUR FEDERAL  
TRADEMARK REGISTRATION**

**WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE  
DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.**

**Requirements in the First Ten Years\***

**What and When to File:**

***First Filing Deadline:*** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. *See* 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

***Second Filing Deadline:*** You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between the 9th and 10th years after the registration date.\*  
*See* 15 U.S.C. §1059.

**Requirements in Successive Ten-Year Periods\***

**What and When to File:**

You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.\*

**Grace Period Filings\***

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

**The United States Patent and Trademark Office (USPTO) will NOT send you any future notice or  
reminder of these filing requirements.**

**\*ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the USPTO. The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. *See* 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. *See* 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

**NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.**

## EXHIBIT 2

# Trademark/Service Mark Application, Principal Register

## TEAS Plus Application

Serial Number: 85231879

Filing Date: 02/01/2011

*NOTE: Data fields with the \* are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.*

The table below presents the data as entered.

Input Field	Entered
<b>TEAS Plus</b>	<b>YES</b>
<b>MARK INFORMATION</b>	
*MARK	<a href="#">BIG FIRM EXPERIENCE...SMALL FIRM SERVICE</a>
*STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
LITERAL ELEMENT	BIG FIRM EXPERIENCE...SMALL FIRM SERVICE
*MARK STATEMENT	The mark consists of standard characters, without claim to any particular font, style, size, or color.
<b>REGISTER</b>	Principal
<b>APPLICANT INFORMATION</b>	
*OWNER OF MARK	Melvin N.A. Avanzado
DBA/AKA/TA/FORMERLY	DBA The Avanzado Law Firm
*STREET	1880 Century Park East; Suite 1404
*CITY	Los Angeles
*STATE (Required for U.S. applicants)	California
*COUNTRY	United States
*ZIP/POSTAL CODE	

<b>(Required for U.S. applicants only)</b>	90067
<b>PHONE</b>	310.552.9300
<b>FAX</b>	310.388.5330
<b>EMAIL ADDRESS</b>	mel@avanzadolaw.com
<b>WEBSITE ADDRESS</b>	www.avanzadolaw.com
<b>LEGAL ENTITY INFORMATION</b>	
<b>*TYPE</b>	SOLE PROPRIETORSHIP
<b>* STATE/COUNTRY WHERE LEGALLY ORGANIZED</b>	California
<b>NAME OF INDIVIDUAL &amp; CITIZENSHIP</b>	Melvin N.A. Avanzado - U.S. Citizen
<b>GOODS AND/OR SERVICES AND BASIS INFORMATION</b>	
<b>* INTERNATIONAL CLASS</b>	045
<b>IDENTIFICATION</b>	Litigation services
<b>* FILING BASIS</b>	SECTION 1(a)
<b>FIRST USE ANYWHERE DATE</b>	At least as early as 03/01/2008
<b>FIRST USE IN COMMERCE DATE</b>	At least as early as 03/01/2008
<b>SPECIMEN FILE NAME(S)</b>	<a href="#">\\TICRS\EXPORT11\IMAGEOUT11\852\318\85231879\xml1\FTK0003.JPG</a>
<b>SPECIMEN DESCRIPTION</b>	Screen Capture from website where mark is featured in yellow type at the bottom of large picture
<b>ADDITIONAL STATEMENTS INFORMATION</b>	
<b>*TRANSLATION (if applicable)</b>	
<b>*TRANSLITERATION (if applicable)</b>	
<b>*CLAIMED PRIOR REGISTRATION (if applicable)</b>	
<b>*CONSENT (NAME/LIKENESS) (if applicable)</b>	
<b>*CONCURRENT USE CLAIM (if applicable)</b>	
<b>ATTORNEY INFORMATION</b>	
<b>NAME</b>	Glenn Truitt
<b>FIRM NAME</b>	MyContractsGuy.com

<b>STREET</b>	PO Box 515381 #55395
<b>CITY</b>	Los Angeles
<b>STATE</b>	California
<b>COUNTRY</b>	United States
<b>ZIP/POSTAL CODE</b>	90051-6681
<b>PHONE</b>	310-403-0417
<b>FAX</b>	323-576-4555
<b>EMAIL ADDRESS</b>	glenn@mycontractsguy.com
<b>AUTHORIZED TO COMMUNICATE VIA EMAIL</b>	Yes
<b>CORRESPONDENCE INFORMATION</b>	
<b>*NAME</b>	Glenn Truitt
<b>FIRM NAME</b>	MyContractsGuy.com
<b>*STREET</b>	PO Box 515381 #55395
<b>*CITY</b>	Los Angeles
<b>*STATE (Required for U.S. applicants)</b>	California
<b>*COUNTRY</b>	United States
<b>*ZIP/POSTAL CODE</b>	90051-6681
<b>PHONE</b>	310-403-0417
<b>FAX</b>	323-576-4555
<b>*EMAIL ADDRESS</b>	glenn@mycontractsguy.com
<b>*AUTHORIZED TO COMMUNICATE VIA EMAIL</b>	Yes
<b>FEE INFORMATION</b>	
<b>NUMBER OF CLASSES</b>	1
<b>FEE PER CLASS</b>	275
<b>*TOTAL FEE PAID</b>	275
<b>SIGNATURE INFORMATION</b>	
<b>* SIGNATURE</b>	/Glenn H Truitt/
<b>* SIGNATORY'S NAME</b>	Glenn H Truitt
<b>* SIGNATORY'S POSITION</b>	Attorney of record, California bar member
<b>* DATE SIGNED</b>	02/01/2011

---

---

## Trademark/Service Mark Application, Principal Register

### TEAS Plus Application

**Serial Number: 85231879**

**Filing Date: 02/01/2011**

#### **To the Commissioner for Trademarks:**

**MARK:** BIG FIRM EXPERIENCE...SMALL FIRM SERVICE (Standard Characters, see [mark](#))  
The literal element of the mark consists of BIG FIRM EXPERIENCE...SMALL FIRM SERVICE.  
The mark consists of standard characters, without claim to any particular font, style, size, or color.

The applicant, Melvin N.A. Avanzado, DBA The Avanzado Law Firm, a sole proprietorship legally organized under the laws of California, comprising of Melvin N.A. Avanzado - U.S. Citizen, having an address of

1880 Century Park East; Suite 1404  
Los Angeles, California 90067  
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

**For specific filing basis information for each item, you must view the display within the Input Table.**

International Class 045: Litigation services

In International Class 045, the mark was first used at least as early as 03/01/2008, and first used in commerce at least as early as 03/01/2008, and is now in use in such commerce. The applicant is submitting one specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods and/or services, consisting of a(n) Screen Capture from website where mark is featured in yellow type at the bottom of large picture.

[Specimen File1](#)

For informational purposes only, applicant's website address is: [www.avanzadolaw.com](http://www.avanzadolaw.com)

The applicant's current Attorney Information:

Glenn Truitt of MyContractsGuy.com

PO Box 515381 #55395  
Los Angeles, California 90051-6681  
United States

The applicant's current Correspondence Information:

Glenn Truitt  
MyContractsGuy.com  
PO Box 515381 #55395  
Los Angeles, California 90051-6681  
310-403-0417(phone)  
323-576-4555(fax)  
glenn@mycontractsguy.com (authorized)

A fee payment in the amount of \$275 has been submitted with the application, representing payment for 1 class(es).

### **Declaration**

The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements, and the like, may jeopardize the validity of the application or any resulting registration, declares that he/she is properly authorized to execute this application on behalf of the applicant; he/she believes the applicant to be the owner of the trademark/service mark sought to be registered, or, if the application is being filed under 15 U.S.C. Section 1051(b), he/she believes applicant to be entitled to use such mark in commerce; to the best of his/her knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion, or to cause mistake, or to deceive; and that all statements made of his/her own knowledge are true; and that all statements made on information and belief are believed to be true.

Signature: /Glenn H Truitt/ Date Signed: 02/01/2011  
Signatory's Name: Glenn H Truitt  
Signatory's Position: Attorney of record, California bar member

RAM Sale Number: 8007  
RAM Accounting Date: 02/02/2011

Serial Number: 85231879  
Internet Transmission Date: Tue Feb 01 22:33:20 EST 2011  
TEAS Stamp: USPTO/FTK-72.193.183.129-201102012233206  
72428-85231879-480aaa0bfbc9c5a6d619a8fac  
0321bf8-CC-8007-20110201214433243292

**BIG FIRM  
EXPERIENCE...SMALL FIRM  
SERVICE**



**BIG FIRM EXPERIENCE... SMALL FIRM SERVICE®**

Experience. Service. Flexibility. Creativity. The Avanzado Law Firm provides clients with the big firm experience and skills of a seasoned trial attorney with the service and flexibility that only a small firm can provide. The Avanzado Law Firm works closely with clients to ensure that strategies employed in any case are tailored to meet the clients' specific goals. We have the ability to litigate aggressively through all stages of any litigation including jury trials. However, we also have the experience and flexibility to develop cost-effective and creative strategies when the big firm "scorched Earth" strategy is unwarranted.

The Avanzado Law Firm is a certified minority owned business enterprise.

Melvin N.A. Avanzado is an AV-rated trial lawyer.

## PRACTICE AREAS

[ENTERTAINMENT LITIGATION](#)

[INTELLECTUAL PROPERTY LITIGATION](#)

[MEDIA AND FIRST AMENDMENT](#)

[COMPLEX CIVIL LITIGATION](#)

[EMPLOYMENT LITIGATION](#)

## FIRM NEWS & EVENTS

[JABA/PABA 2011 INSTALLATION & AWARDS GALA](#)  
01.29.11

[PHILIPPINE AMERICAN BAR ASSOCIATION](#)  
01.29.11

## FOLLOW US

[twitter](#)

[facebook](#)

1880 Century Park East, Suite 1404 • Los Angeles, California 90067 • 310.552.9300 Voice • 310.388.5330 Fax

## EXHIBIT 3

**From:** TMOfficialNotices@USPTO.GOV  
**Sent:** Tuesday, June 7, 2011 00:36 AM  
**To:** glenn@mycontractsguy.com  
**Subject:** Official USPTO Notice of Publication: Serial Number 85231879

---

## NOTICE OF PUBLICATION

**Serial Number:** 85-231,879  
**Mark:** BIG FIRM EXPERIENCE...SMALL FIRM SERVICE(STANDARD CHARACTER MARK)  
**International Class(es):** 045  
**Applicant:** Melvin N.A. Avanzado  
**Attorney Reference Number:**

The mark identified above has been published in the *Trademark Official Gazette* (OG) on Jun 07, 2011. Any party who believes it will be damaged by the registration of the mark may file a notice of opposition (or extension of time therefor) with the Trademark Trial and Appeal Board. If no party files an opposition or extension request within thirty (30) days after the publication date, then within twelve (12) weeks of the publication date a certificate of registration should issue.

On the publication date or shortly thereafter, the applicant should carefully review the information that appears in the OG for accuracy (see steps, *below*). If any information is incorrect, the applicant should immediately email the requested correction to **TMPostPubQuery@uspto.gov**. For general information about this notice, please contact the Trademark Assistance Center at 1-800-786-9199.

1. Click on the following link or paste the URL into an internet browser:  
[http://www.uspto.gov/web/trademarks/tmog/20110607\\_OG.pdf#page=1](http://www.uspto.gov/web/trademarks/tmog/20110607_OG.pdf#page=1)
2. Wait for the total OG to download completely (as indicated on bottom of OG page).
3. At the top/side of the displayed page, click wherever the "binoculars" icon appears.
4. Enter in the "search" box the name of the applicant (for individual: last name, first name) or the serial number in this exact format (with hyphen and comma): 85-231,879, e.g.
5. View the retrieved result(s). If multiple results appear in the "results" box, click directly on each "search term" shown in the box to access all separate appearances in the OG.

# EXHIBIT 4

**Int. Cl.: 45**

**Prior U.S. Cls.: 100 and 101**

**United States Patent and Trademark Office**

**Reg. No. 3,642,830**

Registered June 23, 2009

**SERVICE MARK  
PRINCIPAL REGISTER**

SMALL FIRM, BIG EXPERIENCE

JAHN & ASSOCIATES, LLC (NEVADA LIMITED  
LIABILITY COMPANY)  
1942 BROADWAY SUITE 314  
BOULDER, CO 80302

THE MARK CONSISTS OF STANDARD CHAR-  
ACTERS WITHOUT CLAIM TO ANY PARTICULAR  
FONT, STYLE, SIZE, OR COLOR.

FOR: LEGAL SERVICES, IN CLASS 45 (U.S. CLS.  
100 AND 101).

SER. NO. 77-613,824, FILED 11-13-2008.

FIRST USE 10-31-2001; IN COMMERCE 10-31-2001.

BRIAN NEVILLE, EXAMINING ATTORNEY

# EXHIBIT 5

## Trademark/Service Mark Application, Principal Register

**Serial Number: 77613824**  
**Filing Date: 11/13/2008**

**The table below presents the data as entered.**

Input Field	Entered
<b>SERIAL NUMBER</b>	77613824
<b>MARK INFORMATION</b>	
<b>*MARK</b>	<a href="#">SMALL FIRM, BIG EXPERIENCE</a>
<b>STANDARD CHARACTERS</b>	YES
<b>USPTO-GENERATED IMAGE</b>	YES
<b>LITERAL ELEMENT</b>	SMALL FIRM, BIG EXPERIENCE
<b>MARK STATEMENT</b>	The mark consists of standard characters, without claim to any particular font, style, size, or color.
<b>REGISTER</b>	Principal
<b>APPLICANT INFORMATION</b>	
<b>*OWNER OF MARK</b>	Jahn & Associates, LLC
<b>*STREET</b>	1942 Broadway Suite 314
<b>*CITY</b>	Boulder
<b>*STATE (Required for U.S. applicants)</b>	Colorado
<b>*COUNTRY</b>	United States
<b>*ZIP/POSTAL CODE (Required for U.S. applicants only)</b>	80302
<b>LEGAL ENTITY INFORMATION</b>	
<b>TYPE</b>	corporation
<b>STATE/COUNTRY OF INCORPORATION</b>	Nevada
<b>GOODS AND/OR SERVICES AND BASIS INFORMATION</b>	
<b>*INTERNATIONAL CLASS</b>	
<b>*IDENTIFICATION</b>	Legal services.
<b>FILING BASIS</b>	SECTION 1(a)
<b>FIRST USE ANYWHERE DATE</b>	At least as early as 10/31/2001
<b>FIRST USE IN COMMERCE DATE</b>	At least as early as 10/31/2001
<b>SPECIMEN FILE NAME(S)</b>	
<b>ORIGINAL PDF FILE</b>	<a href="#">spec-7123794224-150407333_ . Flyer.pdf</a>
<b>CONVERTED PDF FILE(S) (2 pages)</b>	<a href="#">\\TICRS\EXPORT4\IMAGEOUT4\776\138\77613824\xml1\APP0003.JPG</a>
	<a href="#">\\TICRS\EXPORT4\IMAGEOUT4\776\138\77613824\xml1\APP0004.JPG</a>

<b>SPECIMEN DESCRIPTION</b>	Use of mark in connection with services
<b>ATTORNEY INFORMATION</b>	
<b>NAME</b>	Kirstin M. Jahn
<b>FIRM NAME</b>	Jahn & Associates, LLC
<b>STREET</b>	1942 Broadway
<b>INTERNAL ADDRESS</b>	Suite 314
<b>CITY</b>	Boulder
<b>STATE</b>	Colorado
<b>COUNTRY</b>	United States
<b>ZIP/POSTAL CODE</b>	80302
<b>PHONE</b>	303-545-5128
<b>EMAIL ADDRESS</b>	Kirstin@kmjlaw.com
<b>AUTHORIZED TO COMMUNICATE VIA EMAIL</b>	Yes
<b>CORRESPONDENCE INFORMATION</b>	
<b>NAME</b>	Kirstin M. Jahn
<b>FIRM NAME</b>	Jahn & Associates, LLC
<b>STREET</b>	1942 Broadway
<b>INTERNAL ADDRESS</b>	Suite 314
<b>CITY</b>	Boulder
<b>STATE</b>	Colorado
<b>COUNTRY</b>	United States
<b>ZIP/POSTAL CODE</b>	80302
<b>PHONE</b>	303-545-5128
<b>EMAIL ADDRESS</b>	Kirstin@kmjlaw.com
<b>AUTHORIZED TO COMMUNICATE VIA EMAIL</b>	Yes
<b>FEE INFORMATION</b>	
<b>NUMBER OF CLASSES</b>	1
<b>FEE PER CLASS</b>	325
<b>*TOTAL FEE DUE</b>	325
<b>*TOTAL FEE PAID</b>	325
<b>SIGNATURE INFORMATION</b>	
<b>SIGNATURE</b>	/kmj/
<b>SIGNATORY'S NAME</b>	Kirstin M. Jahn
<b>SIGNATORY'S POSITION</b>	Owner
<b>DATE SIGNED</b>	11/13/2008

## Trademark/Service Mark Application, Principal Register

**Serial Number: 77613824**

**Filing Date: 11/13/2008**

### To the Commissioner for Trademarks:

**MARK:** SMALL FIRM, BIG EXPERIENCE (Standard Characters, see [mark](#))

The literal element of the mark consists of SMALL FIRM, BIG EXPERIENCE.

The mark consists of standard characters, without claim to any particular font, style, size, or color.

The applicant, Jahn & Associates, LLC, a corporation of Nevada, having an address of  
1942 Broadway Suite 314  
Boulder, Colorado 80302  
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended.

International Class \_\_\_\_\_: Legal services.

Use in Commerce: The applicant is using the mark in commerce, or the applicant's related company or licensee is using the mark in commerce, or the applicant's predecessor in interest used the mark in commerce, on or in connection with the identified goods and/or services. 15 U.S.C. Section 1051(a), as amended.

In International Class \_\_\_\_\_, the mark was first used at least as early as 10/31/2001, and first used in commerce at least as early as 10/31/2001, and is now in use in such commerce. The applicant is submitting one specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods and/or services, consisting of a(n) Use of mark in connection with services.

**Original PDF file:**

[spec-7123794224-150407333 . Flyer.pdf](#)

**Converted PDF file(s)** (2 pages)

[Specimen File1](#)

[Specimen File2](#)

The applicant hereby appoints Kirstin M. Jahn of Jahn & Associates, LLC  
Suite 314  
1942 Broadway  
Boulder, Colorado 80302  
United States

to submit this application on behalf of the applicant.

Correspondence Information: Kirstin M. Jahn

Suite 314  
1942 Broadway  
Boulder, Colorado 80302  
303-545-5128(phone)  
Kirstin@kmjlaw.com (authorized)

A fee payment in the amount of \$325 has been submitted with the application, representing payment for 1 class(es).

### Declaration

The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements, and the like, may jeopardize the validity of the application or any resulting registration, declares that he/she is properly authorized to execute this application on behalf of the applicant; he/she believes the applicant to be the owner of the trademark/service mark sought to be registered, or, if the application is being filed under 15 U.S.C. Section 1051(b), he/she

believes applicant to be entitled to use such mark in commerce; to the best of his/her knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion, or to cause mistake, or to deceive; and that all statements made of his/her own knowledge are true; and that all statements made on information and belief are believed to be true.

Signature: /kmj/ Date Signed: 11/13/2008

Signatory's Name: Kirstin M. Jahn

Signatory's Position: Owner

RAM Sale Number: 340

RAM Accounting Date: 11/14/2008

Serial Number: 77613824

Internet Transmission Date: Thu Nov 13 15:14:02 EST 2008

TEAS Stamp: USPTO/BAS-XX.XXX.XX.XXX-2008111315140280

0785-77613824-400bef623e2ad5d219d82aa4f8

c57e36e67-CC-340-20081113150407333427

SMALL FIRM, BIG EXPERIENCE

Patent

Trademark

Copyright

Law

*Do you know the difference between a trademark and a trade name?*

What about a common law trademark and a federal trademark? If you've answered 'no' or even 'sort of' then you're like countless business owners and managers. But don't worry! Working through this handout will help you become comfortable with this differentiation. What's more, you'll have a clear picture of your next steps toward protecting your business, brand and product names.

The case history below describes events that hundreds of businesses have experienced. Most important, it outlines a serious reality about intellectual property: without the proper trademark registration in place, the hard work that folks like you invest in your dreams and ideas can be jeopardized.

.....

## Case History

### Purple Sun, Inc.

In 1995, Bob and Linda Jones founded Purple Sun, Inc. and began making Purple Sun Lemonade. By their measure, success came quickly. Deep roots in the local natural foods industry helped to get their product into stores quickly. Several great employees and a little luck didn't hurt, either.

By 1999, they had 23 employees and Purple Sun Lemonade was a favorite in stores all over Boulder and the surrounding area. So good was their lemonade that they regularly fielded calls from folks who had tried it out while visiting Boulder. Again and again they heard, "When are you going to sell your lemonade in our area?"

Being astute entrepreneurs, they soon realized two things. Without really trying they had developed a quality brand whose reputation had grown beyond their home turf. If they wanted to expand their business to match the growth of their reputation, now was the time.

The dream of growing their business spread like wildfire through the company. Soon Bob and Linda were strategizing on how to make it happen. They negotiated with distributors, mapped out production and planned a national ad campaign. Then Bob asked a simple question. "What about a trademark - shouldn't we have one?"

"Isn't that what we got when we applied for our trade name," was Linda's reply. By now you've probably guessed the answer. After a quick search they discovered that in 1997, another company had filed a federal trademark application for Purple Sun Lemonade. All Bob and Linda "owned" were common law rights in the Purple Sun trademark and a trade name. Suddenly the founders of Purple Sun, Inc. were faced with a hard decision: go national by changing their product name - and in the process losing the brand recognition entrenched in their home territory - or scrap their expansion plans. Could this have been prevented? The answer is **YES**.

## In Plain English

**Trademark:** A trademark identifies and protects a specific product or service. A good way to think about a trademark is that it is an *adjective* (identifier) modifying a *noun* (product or service).

Examples are *Purple Sun* lemonade, *Apple* computers, and *Pepsi* cola.

**Common Law Trademarks:** A trademark can be used without obtaining a federal or state registration. This is known as "common law" use of a trademark and is often noted by the ™ symbol. It protects a product according to where and when the mark is first used.

Purple Sun, Inc. had a common law mark that protected use of their product within the Boulder Valley area. Since a federal mark for the same name belonged to another company, Bob and Linda were limited to using the mark within their home territory.

**Trade Name:** A trade name is the name applied for, through the state, that is needed to conduct business in the state.

When Bob and Linda began Purple Sun, Inc. they received a **trade name** through the tax division of the state of Colorado - they did not receive a trademark.

**Federal Trademark Registration:** A United States trademark registration - designated by the superscript ® - provides the owner with the right to use the mark with their product or service. These rights apply to use within the United States and its territories for a period of ten years. The owner has rights to renew the mark so long as it remains in continuous use in interstate commerce.

The exception to this is highlighted by the Purple Sun case history. The competitor that filed the federal mark for the same name gained rights to use it in all places except for Boulder and the surrounding area.

## Small Firm, Big Experience

With locations in Reno, Nevada and Boulder, Colorado, Jahn & Associates is a boutique firm focused exclusively on intellectual property law. Although many firms include this specialty in their list of practice areas, very few can claim it as a sole concentration.

Jahn & Associates draws upon a decade of experience that began with general practice, including civil litigation, corporate and securities law. Today, their concentration on intellectual property law includes patents, trademarks, copyrights and trade secrets. The firm has been kept small, which makes a lot of sense when their clients sit down to consult with them. It isn't only that one-on-one conversations include the unique perspectives of the small business. It's that, on a day-to-day basis, Jahn & Associates is a small firm drawing upon big experience. For their clients - and folks like you - this means big value with a small price tag.

## Kirstin M. Jahn, Attorney at Law

In 1997, Kirstin Jahn founded Jahn & Associates and dedicated herself to serving the intellectual property needs of small and medium-sized organizations. After ten years of practicing law, she runs a practice that emphasizes quality and efficiency. No matter is too large or small. With associates in firms all around the globe, she has successfully served clients' needs domestically and internationally. Experience has shown Kirstin that clients often prefer a peaceful resolution to disputes and she makes every effort to negotiate successfully before engaging in litigation. Because she focuses her practice solely on intellectual property, a conflict of interest rarely arises between her firm and an organization's corporate representation. In fact, in the majority of these situations the two firms work together toward a resolution to meet the needs of their joint client.

For further information regarding your trademark and other intellectual property needs, please call Jahn & Associates at (303)545-5128 in Boulder, Colorado or (775)329-2282 in Reno, Nevada. You can discover more about her firm on the web at [www.kmjlaw.com](http://www.kmjlaw.com).



Colorado | 1942 Broadway, Suite 510  
Boulder, Colorado 80302  
tel (303)545.5128  
fax (303)545.5196

Nevada | 565 California Avenue  
Reno, Nevada 89509  
tel (775)329.2282  
fax (775)348.7977

# EXHIBIT 6



# Jahn & Associates

Practicing Primarily In Intellectual Property Law

**Kirstin M. Jahn**

Licensed In:

- New York
- Nevada
- Colorado

September 23, 2014

Melvin NA Avanzado  
1880 Century Park East; Suite 1404  
Los Angeles, CA 90067

Re: Trademark Registration No. 4015965  
BIG FIRM EXPERIENCE... SMALL FIRM SERVICE

Dear Mr. Avanzado:

Enclosed please find the Petition for Cancellation of the above referenced trademark which was filed today with the USPTO.

Sincerely,  
Jahn & Associates, LLC



Kirstin M. Jahn  
Kirstin@jahnlaw.com

**COLORADO**

1942 Broadway, Suite 314  
Boulder, CO 80302  
Phone: 303 545 5128  
Fax: 303 545 5196

**NEVADA**

200 S Virginia, 8th Floor  
Reno, NV 89501  
phone: (775) 398-3035

Small Firm, Big Experience ®  
[www.jahnlaw.com](http://www.jahnlaw.com)



United States Patent and Trademark Office

[Home](#) | [Site Index](#) | [Search](#) | [Guides](#) | [Contacts](#) | [eBusiness](#) | [eBiz alerts](#) | [News](#) | [Help](#)**Electronic System for Trademark Trials and Appeals****Receipt**

Your submission has been received by the USPTO.  
The content of your submission is listed below.  
You may print a copy of this receipt for your records.

ESTTA Tracking number: **ESTTA628779**Filing date: **09/23/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

**Petition for Cancellation**

Notice is hereby given that the following party requests to cancel indicated registration.

**Petitioner Information**

<b>Name</b>	Jahn & Associates		
<b>Entity</b>	limited liability corporation	<b>Citizenship</b>	NV
<b>Address</b>	1942 Broadway Suite 314 Boulder, CO 80304 UNITED STATES		

<b>Correspondence information</b>	Kirstin M. Jahn Jahn & Associates 1942 Broadway Suite 314 Boulder, CO 80304 UNITED STATES Kirstin@jahnlaw.com
-----------------------------------	--

**Registration Subject to Cancellation**

<b>Registration No</b>	4015965	<b>Registration date</b>	08/23/2011
<b>Registrant</b>	Melvin N.A. Avanzado 1880 Century Park East; Suite 1404		

Los Angeles, CA 90067 UNITED STATES
--

**Goods/Services Subject to Cancellation**

Class 045. First Use: 2008/03/01 First Use In Commerce: 2008/03/01 All goods and services in the class are cancelled, namely: Litigation services
--

**Grounds for Cancellation**

Priority and likelihood of confusion	Trademark Act section 2(d)
--------------------------------------	----------------------------

**Mark Cited by Petitioner as Basis for Cancellation**

<b>U.S. Registration No.</b>	3642830	<b>Application Date</b>	11/13/2008
<b>Registration Date</b>	06/23/2009	<b>Foreign Priority Date</b>	NONE
<b>Word Mark</b>	SMALL FIRM, BIG EXPERIENCE		
<b>Design Mark</b>	77613824#TMSN.png		
<b>Description of Mark</b>	NONE		
<b>Goods/Services</b>	Class 045. First use: First Use: 2001/10/31 First Use In Commerce: 2001/10/31 Legal services		

<b>Attachments</b>	77613824#TMSN.png( bytes ) Cancellation of BIG FIRM EXPERIENCE.pdf(15510 bytes )
--------------------	---

**Certificate of Service**

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

<b>Signature</b>	s/KMJ/
<b>Name</b>	Kirstin M. Jahn
<b>Date</b>	09/23/2014

**[Return to ESTTA home page](#) [Start another ESTTA filing](#)**

[| HOME](#) | [INDEX](#) | [SEARCH](#) | [eBUSINESS](#) | [CONTACT US](#) | [PRIVACY STATEMENT](#)

Cancellation of BIG FIRM EXPERIENCE ... SMALL FIRM SERVICE  
Registration No. 4015965

Statement of Claim

1. Jahn & Associates, LLC is the owner of a trademark registration for SMALL FIRM BIG EXPERIENCE which was registered on June 23, 2009 as United States Trademark Registration No. 3,642,830 for use in connection with legal services and has been in continuous use in commerce since October of 2001.
2. Since at least 2001, Jahn & Associates has expended a great amount of time, effort and money in connection with the promotion and advertisement of its services which are sold and offered for sale under the SMALL FIRM BIG EXPERIENCE mark and the Mark has become an asset of substantial value as a symbol of Jahn & Associates, its quality services and its goodwill.
3. Since at least 2001, Jahn & Associates has continuously, extensively and widely promoted, advertised and/or sold its services under the Mark in various states and foreign countries and has widely used the Mark to identify its services and distinguish them from the goods of others and continues to do so.
4. Notwithstanding Jahn & Associates' well-known and prior common law and statutory rights in the Mark, Respondent applied for, and received a federal registration for a confusingly similar mark, BIG FIRM EXPERIENCE... SMALL FIRM SERVICE for litigation services under Registration Number 4015965. Respondents use of its mark has and is likely to create confusion, mistake and deception as to the affiliation, connection, association, origin, sponsorship or approval of the services by Respondent with those of Jahn & Associates, all to Jahn & Associates' irreparable loss and damage.
5. Upon information and belief, actual confusion of consumers has occurred or will likely occur and will continue to occur as a result of the acts of Respondent, unless Respondent's mark is cancelled.

Respectfully submitted,  
s/Kirstin M. Jahn  
Jahn & Associates

# EXHIBIT 7

TO DO



United States Patent and Trademark Office

Home | Site Index | Search | FAQ | Glossary | Guides | Contacts | eBusiness | eBiz alerts | News | Help

Trademarks > Trademark Electronic Search System (TESS)

TESS was last updated on Fri May 31 02:20:18 EDT 2013

- [TESS HOME](#)
- [NEW USER](#)
- [STRUCTURED](#)
- [FREE FORM](#)
- [Browse Dict](#)
- [SEARCH OG](#)
- [BOTTOM](#)
- [HELP](#)
- [PREV LIST](#)
- [CURR LIST](#)
- [NEXT LIST](#)
- [FIRST DOC](#)
- [PREV DOC](#)
- [NEXT DOC](#)
- [LAST DOC](#)

Please logout when you are done to release system resources allocated for you.

List At:  OR  to record:  **Record 1 out of 2**

( Use the "Back" button of the Internet Browser to return to TESS)

# BIG FIRM EXPERIENCE... SMALL FIRM SERVICE

<b>Word Mark</b>	<b>BIG FIRM EXPERIENCE... SMALL FIRM SERVICE</b>
<b>Goods and Services</b>	IC 045. US 100 101. G & S: Litigation services. FIRST USE: 20080301. FIRST USE IN COMMERCE: 20080301
<b>Standard Characters Claimed</b>	
<b>Mark Drawing Code</b>	(4) STANDARD CHARACTER MARK
<b>Serial Number</b>	85231879
<b>Filing Date</b>	February 1, 2011
<b>Current Basis</b>	1A
<b>Original Filing Basis</b>	1A
<b>Published for Opposition</b>	June 7, 2011
<b>Registration Number</b>	4015965
<b>Registration Date</b>	August 23, 2011
<b>Owner</b>	(REGISTRANT) Melvin N.A. Avanzado DBA The Avanzado Law Firm Melvin N.A. Avanzado - U.S. Citizen SOLE PROPRIETORSHIP CALIFORNIA 1880 Century Park East; Suite 1404 Los Angeles CALIFORNIA 90067
<b>Attorney of Record</b>	Glenn Truitt

# EXHIBIT 8

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**  
**BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of the Cancellation for Registration of: BIG FIRM EXPERIENCE, SMALL FIRM SERVICE; Registration Number: 4015965; Filing Date: February 1, 2011.

Jahn & Associates, LLC  
Petitioner

v.

Melvin N.A. Avanzado  
Respondent.

---

)  
)  
) **CANCELLATION NO 92060029**  
)  
) **PETITIONER'S RESPONSE**  
) **TO RESPONDENT'S FIRST**  
) **SET OF REQUESTS FOR**  
) **ADMISSION**

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Petitioner, hereby responds to Respondent's First Set of Requests for Admission as follows:

**GENERAL OBJECTIONS**

Petitioner makes the following General Objections in response to each Request for Production.

1. Petitioner objects to each Request to the extent it seeks or calls for information protected by the attorney-client privilege and or protected by the work-product doctrine, or subject to any other applicable privilege.

2. Petitioner objects to each Request to the extent it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

3. Petitioner objects to each Request to the extent it purports to call for information not in their possession, custody or control.

4. Petitioner objects to the definition of "you" and "your" as being overbroad,

unduly burdensome, vague and ambiguous.

5. Petitioner objects to each Request to the extent it seeks to impose requirements and/or obligations inconsistent with and in addition to, the Federal Rules of Civil Procedure, the Federal Rules of Evidence and/or Rules of this tribunal, and that are unduly burdensome and oppressive.

7. Discovery is continuing in this action. Petitioner reserves the right to supplement and amend its responses to these Requests based on, but not limited to, information subsequently discovered, inadvertently omitted, or mistakenly stated in these response.

### **RESPONSES TO REQUESTS FOR ADMISSION**

Request No. 1: ADMIT that YOU failed to file a notice of opposition with the United States Trademark Trial and Appeal Board upon the July 7, 2011 publication of AVANZADO'S MARK in connection with AVANZADO's application to register AVANZADO's mark.

RESPONSE: Petitioner is without information sufficient to form a belief as to the date of publication, if any, of AVANZADO's MARK and as such, the Request is denied.

Request No. 2: ADMIT that YOU failed to file an extension of time with the United States Trademark Trial and Appeal Board to file a notice of opposition upon the July 7, 2011 publication of AVANZADO's MARK in connection with Avanzado's application to register AVANZADO's Mark.

RESPONSE: Petitioner is without information sufficient to form a belief as to the date of publication, if any, of AVANZADO's MARK and as such the Request is denied.

Request No. 3: ADMIT that since AVANZADO's MARK was granted trademark registration by the United States Trademark Trial and Appeal Board on August 23, 2011, YOU have not filed a notice of opposition.

RESPONSE: Petitioner is without information sufficient to form a belief as to the approval, if any, of the AVANZADO's MARK by the United States Trademark Trial and Appeal Board and as such the Request is denied.

Request No. 4: ADMIT that since AVANZADO's MARK was granted trademark registration by the United States Trademark Trial and Appeal Board on August 23, 2011, You did not file a petition for cancellation until September 23, 2014.

RESPONSE: Petitioner is without information sufficient to form a belief as to the grant of the AVANZADO's MARK by the United States Trademark Trial and Appeal Board and as such the Request is denied.

Request No. 5: ADMIT that YOU are not admitted to practice law in the state of California.

RESPONSE: Petitioner Kirstin M. Jahn has been admitted *pro hac vice* on several cases venued in California and to that extent denies Request No. 5.

Request No. 6: ADMIT that YOU do not represent clients in the state of California.

RESPONSE: Petitioner Kirstin M. Jahn has been admitted *pro hac vice* on several cases venued in California on behalf of clients domiciled in California and to that extent denies Request No. 6.

Request No. 7: ADMIT that You are admitted to practice law in the states of Colorado and Nevada.

RESPONSE: Admitted.

Request No. 8: ADMIT that AVANZADO's Mark was published in the Trademark Official Gazette on June 7, 2011.

RESPONSE: Petitioner is without information sufficient to form a belief as to the date of publication, if any, of AVANZADO's MARK and as such the Request is denied.

Request No. 9: ADMIT that under the trademark registration process, any party who believes it will be damaged by the registration of a mark may file a notice of opposition or extension of time therefor with the Trademark Trial and Appeal Board.

RESPONSE: Petitioner objects to Request No. 9 on the basis that it calls for a legal conclusion.

Request No. 10: ADMIT that the length of time between Avanzado's February 1, 2011 application to the United States Patent and Trademark Office to register AVANZADO's MARK and YOUR September 23, 2014 petition for cancellation is over three and a half years.

RESPONSE: Petitioner is without information sufficient to form a belief as to the date of application to the United States Patent and Trademark Office to register AVANZADO's MARK and to that extent Request No. 10 is denied.

Request No. 11: ADMIT that the length of time between the June 7, 2011 publication of AVANZADO's MARK in the Trademark Official Gazette and YOUR September 23, 2014 petitioner for cancellations is more than three years.

RESPONSE: Petitioner is without information sufficient to form a belief as to the date of publication of AVANZADO's MARK in the Trademark Official Gazette and as such Request No. 11 is denied.

Request No. 12: ADMIT that the length of time between the August 23, 2011 issuance

of registration for AVANZADO's MARK and YOUR September 23, 2014 petition for cancellation is more than three years.

RESPONSE: Petitioner is without information sufficient to form a belief as to the date of issuance of registration of AVANZADO's MARK and as such Request No. 12 is denied.

Dated: March 9, 2015

**JAHN & ASSOCIATES, LLC**

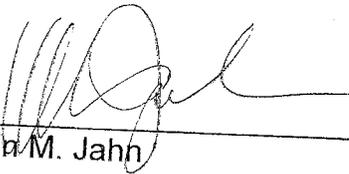
A handwritten signature in black ink, appearing to read "Kirstin M. Jahn", is written over a horizontal line.

Kirstin M. Jahn  
Petitioner

**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited on March 9, 2015 by  
United States Post Office with sufficient postage as first-class mail in an envelope  
addressed to:

Melvin N.A. Avanzado  
1880 Century Park East  
Suite 1100  
Los Angeles, CA 90067

  
Kirstin M. Jahn

## EXHIBIT 9

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**  
**BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of the Cancellation for Registration of: BIG FIRM EXPERIENCE, SMALL FIRM SERVICE; Registration Number: 4015965; Filing Date: February 1, 2011.

Jahn & Associates, LLC	)
Petitioner	)
	) <b><u>CANCELLATION NO 92060029</u></b>
v.	)
Melvin N.A. Avanzado	) <b>PETITIONER'S RESPONSE</b>
Respondent.	) <b>TO RESPONDENT'S FIRST</b>
_____	) <b>SET OF INTERROGATORIES</b>
	)

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Petitioner, hereby responds to Respondent's First Set of Interrogatories as follows:

**GENERAL OBJECTIONS**

Petitioner makes the following General Objections in response to each Interrogatory Request.

1. Petitioner objects to each Request to the extent it seeks or calls for information protected by the attorney-client privilege and or protected by the work-product doctrine, or subject to any other applicable privilege.

2. Petitioner objects to each Request to the extent it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

3. Petitioner objects to each Request to the extent it purports to call for information not in their possession, custody or control.

4. Petitioner objects to the definition of "you" and "your" as being overbroad,

unduly burdensome, vague and ambiguous.

5. Petitioner objects to each Request to the extent it seeks to impose requirements and/or obligations inconsistent with and in addition to, the Federal Rules of Civil Procedure, the Federal Rules of Evidence and/or Rules of this tribunal, and that are unduly burdensome and oppressive.

7. Discovery is continuing in this action. Petitioner reserves the right to supplement and amend its responses to these Requests based on, but not limited to, information subsequently discovered, inadvertently omitted, or mistakenly stated in these response.

### **RESPONSES TO INTERROGATORIES**

INTERROGATORY NO. 1: STATE the identities of all individuals from California who sought legal advise or representation from YOU or YOUR Practice.

RESPONSE: Petitioner objects to this request on the basis that it is overly broad, unduly burdensome, vague and ambiguous as to the term "Representation of clients in California." Petitioner further objects to this request on the basis that it calls for information protected by the attorney- client privilege and/or attorney work product doctrine. Specifically, as Petitioner understands the request, Petitioner includes, the following cases which are publically available and were handled by Petitioner in California: SalesBrain et al v. Teligent et al, Case No. CV 13-00265 venued in the U.S. District Court, Northern District of California, San Francisco Division; SalesBrain v. Angelvision Technologies, Case No. CV Case No. CV 12-05026 LB venued in the U.S. District Court, Northern District of California, San Francisco Division; Atlantis Scientific

v. Keyhole, Case No. CO2-03142 venued in the U.S. District Court, Northern District of California, Oakland Division. Subject to these objections, relevant, non-privileged, non-work product documents, if any exist, will be produced.

INTERROGATORY NO 2: STATE the identities of all potential and actual clientele from California who sought legal advice or representation from YOU or YOUR practice.

RESPONSE: Petitioner objects to this request on the basis that it is overly broad, unduly burdensome, vague and ambiguous as to the term "Representation of clients in California." Petitioner further objects to this request on the basis that it calls for information protected by the attorney- client privilege and/or attorney work product doctrine. Specifically, as Petitioner understands the request, Petitioner includes, the following cases which are publically available and were handled by Petitioner in California: SalesBrain et al v. Teligent et al, Case No. CV 13-00265 venued in the U.S. District Court, Northern District of California, San Francisco Division; SalesBrain v. Angelvision Technologies, Case No. CV Case No. CV 12-05026 LB venued in the U.S. District Court, Northern District of California, San Francisco Division; Atlantis Scientific v. Keyhole, Case No. CO2-03142 venued in the U.S. District Court, Northern District of California, Oakland Division. Subject to these objections, relevant, non-privileged, non-work product documents, if any exist, will be produced.

INTERROGATORY NO. 3: STATE all instances in which YOU practiced law in California.

RESPONSE: Petitioner objects to this request on the basis that it is overly broad, unduly burdensome, vague and ambiguous as to the term "Representation of clients in California." Petitioner further objects to this request on the basis that it calls for

information protected by the attorney- client privilege and/or attorney work product doctrine. Specifically, as Petitioner understands the request, Petitioner includes, the following cases which are publically available and were handled by Petitioner in California: SalesBrain et al v. Teligent et al, Case No. CV 13-00265 venued in the U.S. District Court, Northern District of California, San Francisco Division; SalesBrain v. Angelvision Technologies, Case No. CV Case No. CV 12-05026 LB venued in the U.S. District Court, Northern District of California, San Francisco Division; Atlantis Scientific v. Keyhole, Case No. CO2-03142 venued in the U.S. District Court, Northern District of California, Oakland Division. Subject to these objections, relevant, non-privileged, non-work product documents, if any exist, will be produced.

INTERROGATORY NO. 4. State all instances in which YOU represented clients in California.

RESPONSE: Petitioner objects to this request on the basis that it is overly broad, unduly burdensome, vague and ambiguous as to the term "Representation of clients in California." Petitioner further objects to this request on the basis that it calls for information protected by the attorney- client privilege and/or attorney work product doctrine. Specifically, as Petitioner understands the request, Petitioner includes, the following cases which are publically available and were handled by Petitioner in California: SalesBrain et al v. Teligent et al, Case No. CV 13-00265 venued in the U.S. District Court, Northern District of California, San Francisco Division; SalesBrain v. Angelvision Technologies, Case No. CV Case No. CV 12-05026 LB venued in the U.S. District Court, Northern District of California, San Francisco Division; Atlantis Scientific v. Keyhole, Case No. CO2-03142 venued in the U.S. District Court, Northern District of

California, Oakland Division. Subject to these objections, relevant, non-privileged, non-work product documents, if any exist, will be produced.

INTERROGATORY NO. 5: State when YOU first learned of Avanzado's February 1, 2011 application for trademark registration of AVANZADO's Mark.

RESPONSE: Petitioner first learned of the registration of AVANZADO's Mark on or about May 31, 2013.

INTERROGATORY NO. 6: STATE when you first learned of AVANZADO's Mark.

RESPONSE: Petitioner believes it first learned of AVANZADO's Mark in or about May, 2013.

INTERROGATORY NO. 7: STATE all facts that support YOUR "Likelihood of confusion" claim which YOU stated as a ground for cancellation in YOUR petition for cancellation.

RESPONSE: As between Petitioner's Mark, "Small Firm, Big Experience" and Respondent's Mark " Big Firm Experience... Small Firm service", Petitioner at this time provides the following facts supporting likelihood of confusion between the two marks:

1. The marks are similar in appearance, sound, connotation and commercial impression.
2. The nature of the services as described in the respective registrations is the same.
3. The trade channels are the same.
4. Petitioner's mark is very strong and has been in use since 2001. Discovery is still in its early stages and Petitioner reserves the right to amend this response as discovery proceeds.

INTERROGATORY NO. 8. STATE all evidence YOU have that support YOUR "likelihood of confusion" claim which YOU stated as a ground for cancellation in YOUR petition for cancellation.

RESPONSE: As between Petitioner's Mark, "Small Firm, Big Experience" and Respondent's Mark " Big Firm Experience... Small Firm service", Petitioner at this time provides the following facts supporting likelihood of confusion between the two marks:

1. The marks are similar in appearance, sound, connotation and commercial impression. 2. The nature of the services as described in the respective registrations is the same. 3. The trade channels are the same. 4. Petitioner's mark is very strong and has been in use since 2001. Discovery is still in its early stages and Petitioner reserves the right to amend this response as discovery proceeds.

INTERROGATORY NO. 9: STATE all uses of PLAINTIFF's MARK that YOU have made in commerce or any similar wording.

RESPONSE: Petitioner objects to this request on the basis that it is overly broad, unduly burdensome, vague and ambiguous. Petitioner further objects to this request on the basis that it calls for information protected by the attorney- client privilege and/or attorney work product doctrine. Petitioner further objects to this request to the extent it seeks information within the knowledge of Respondent. Subject to these objections, Petitioner states that use of its Mark, Small Firm, Big Experience has been made on its website since 2001, in flyers and brochures since 2001 and on its letterhead.

INTERROGATORY NO. 10: STATE all periods of time in which YOU have used PLAINTIFF's MARK on or in connection with YOUR related services and/or advertising or promotion of YOUR services.

RESPONSE: Petitioner has been continuously using its mark since at least October 31, 2001.

INTERROGATORY NO. 11: STATE the identities of all YOUR clients or potential clients

who have expressed any question, concern or comment regarding any affiliation between YOU and Avanzado.

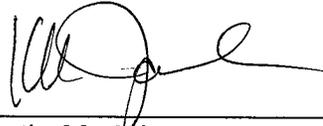
RESPONSE: Petitioner objects to this request on the basis that it is overly broad, unduly burdensome, vague and ambiguous. Petitioner further objects to this request on the basis that it calls for information protected by the attorney- client privilege and/or attorney work product doctrine.

INTERROGATORY NO. 12: STATE the identities of all persons who consulted, supervised, directed or were otherwise involved in creating and/or selecting PLAINTIFF'S MARK.

RESPONSE: At this time, Petitioner can only recall the name of Kirstin M. Jahn.

Dated: March 9, 2015

**JAHN & ASSOCIATES, LLC**



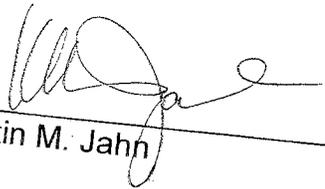
---

Kirstin M. Jahn  
Petitioner

**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited on March 9, 2015 by  
United States Post Office with sufficient postage as first-class mail in an envelope  
addressed to:

Melvin N.A. Avanzado  
1880 Century Park East  
Suite 1100  
Los Angeles, CA 90067

  
Kirstin M. Jahn

# EXHIBIT 10

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**  
**BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of the Cancellation for Registration of: BIG FIRM EXPERIENCE, SMALL FIRM SERVICE; Registration Number: 4015965; Filing Date: February 1, 2011.

Jahn & Associates, LLC	)	
Petitioner	)	
	)	<b><u>CANCELLATION NO 92060029</u></b>
v.	)	
Melvin N.A. Avanzado	)	<b>PETITIONER'S RESPONSE</b>
Respondent.	)	<b>TO RESPONDENT'S SECOND</b>
_____	)	<b>SET OF INTERROGATORIES</b>
	)	

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Petitioner, hereby responds to Respondent's First Set of Interrogatories as follows:

**GENERAL OBJECTIONS**

Petitioner makes the following General Objections in response to each Interrogatory Request.

1. Petitioner objects to each Request to the extent it seeks or calls for information protected by the attorney-client privilege and or protected by the work-product doctrine, or subject to any other applicable privilege.

2. Petitioner objects to each Request to the extent it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

3. Petitioner objects to each Request to the extent it purports to call for information not in their possession, custody or control.

4. Petitioner objects to the definition of "you" and "your" as being overbroad,

unduly burdensome, vague and ambiguous.

5. Petitioner objects to each Request to the extent it seeks to impose requirements and/or obligations inconsistent with and in addition to, the Federal Rules of Civil Procedure, the Federal Rules of Evidence and/or Rules of this tribunal, and that are unduly burdensome and oppressive.

7. Discovery is continuing in this action. Petitioner reserves the right to supplement and amend its responses to these Requests based on, but not limited to, information subsequently discovered, inadvertently omitted, or mistakenly stated in these response.

### **RESPONSES TO INTERROGATORIES**

INTERROGATORY NO. 13: STATE all YOUR damages which YOU claim were caused by AVANZADO's MARK

RESPONSE: Petitioner's mark has been diluted and weakened.

INTERROGATORY NO. 14: STATE all YOUR irreparable losses which YOU claim were caused by AVANZADO's Mark.

RESPONSE: Dilution, weakened mark.

INTERROGATORY NO. 15. STATE the circumstance under which YOU were admitted to practice law in California for SalesBrain v. Teligent case CV 13-00265 venued in the USDC, N. D. of California. RESPONSE: Petitioner was admitted Pro Hac Vice.

INTERROGATORY NO. 16: STATE the circumstance under which YOU were admitted to practice law in California for Atlantis Scientific v. Keyhole case venued in the USDC, N. D. of California.

RESPONSE: Petitioner was admitted Pro Hac Vice.

INTERROGATORY NO. 17: STATE the circumstance under which YOU were admitted to practice law in California for Atlantis Scientific v Keyhole case venued in the USDC, N. D. of California.

RESPONSE: Petitioner was admitted Pro Hac Vice.

INTERROGATORY NO. 18. STATE the circumstances under which you were approached to represent he plaintiff for SALESBRAIN v. TELIGENT case venued in the USDC, N. District of CALIFORNIA.

RESPONSE: Petitioner objects to this request on the basis that it calls for information protected by the attorney- client privilege and/or attorney work product doctrine.

INTERROGATORY NO. 19. STATE the circumstances under which you were approached to represent he plaintiff for SALESBRAIN v. ANGELVISION TECHNOLOGIES venued in the USDC, N. District of CALIFORNIA.

RESPONSE: Petitioner objects to this request on the basis that it calls for information protected by the attorney- client privilege and/or attorney work product doctrine.

INTERROGATORY NO 20. STATE the circumstances under which you were approached to represent he plaintiff for ATLANTIS SCIENTIFIC v. KEYHOLE venued in the USDC, N. District of CALIFORNIA.

RESPONSE: Petitioner objects to this request on the basis that it calls for information protected by the attorney- client privilege and/or attorney work product doctrine.

INTERROGATORY NO 21. STATE in detail the instances of the alleged actual confusion between AVANZADO's MARK and PLAINTIFF's MARK.

RESPONSE: Petitioner is unaware at this time of any actual confusion between AVANZADO's MARK and PLAINTIFF's MARK at this time.

INTERROGATORY NO. 22. State all facts and identify all evidence on which you rely to support your contention of the alleged actual confusion between AVANZADO's MARK and PLAINTIFF's Mark.

RESPONSE. Petitioner is unaware at this time of any actual confusion between AVANZADO's MARK and PLAINTIFF's MARK at this time.

INTERROGATORY NO 23. STATE all facts and identify all evidence on which you rely to support your contention of the alleged likelihood of confusion between AVANZADO's MARK and PLAINTIFF'S MARK.

RESPONSE. Petitioner objects to this request on the basis that it calls for a legal argument and conclusion. Subject to that objection: The marks look the same, sound the same and have the same meaning. The trade channels are the same. The services are the same. Petitioner's mark is a strong mark, or was, at least before Respondent entered the market.

INTERROGATORY NO. 24 Identify all customers or potential customers of YOU who have expressed any question, concern or comment regarding any affiliation between YOU and AVANZADO.

RESPONSE: Petitioner objects to this request on the basis that it calls for information protected by the attorney- client privilege and/or attorney work product doctrine.

Petitioner is unaware of any current customers who have expressed any question, concern or comment regarding any affiliation between Petitioner and Respondent.

Dated: June 3, 2014

**JAHN & ASSOCIATES, LLC**

s/Kirstin M. Jahn  
Kirstin M. Jahn  
Petitioner

**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being emailed on June 3, 2014 (PST) to the email address below and mailed on June 4, 2014 by United States Post Office with sufficient postage as first-class mail in an envelope addressed to:

Elaine@avanzadolaw.com

Melvin N.A. Avanzado  
1880 Century Park East  
Suite 1100  
Los Angeles, CA 90067

s/Kirstin M. Jahn  
Kirstin M. Jahn

# EXHIBIT 11



(<http://jahnlaw.com/>)

[HOME \(HTTP://JAHNLAW.COM/\)](http://JAHNLAW.COM/)

[AREAS OF PRACTICE \(HTTP://JAHNLAW.COM/AREAS-OF-PRACTICE/\)](http://JAHNLAW.COM/AREAS-OF-PRACTICE/)

[CASES \(HTTP://JAHNLAW.COM/CASES/\)](http://JAHNLAW.COM/CASES/)

[ABOUT \(HTTP://JAHNLAW.COM/ABOUT/\)](http://JAHNLAW.COM/ABOUT/)

[CONTACT \(HTTP://JAHNLAW.COM/CONTACT-US/\)](http://JAHNLAW.COM/CONTACT-US/)



## Jahn + Associates

Jahn & Associates is a boutique firm specializing in intellectual property law. Since 1997, drawing upon over two decades of experience in general practice and civil litigation, the firm's practice has focused on litigation and licensing in the areas of patent, trademark, copyright, trade secret and entertainment law. In addition, the firm handles trademark and copyright prosecution domestically and abroad using a network of associates located throughout the world.

## Colorado Office

1942 Broadway, Suite 314  
Boulder, CO 80302  
P: (Phone) (303) 545-5128  
E: (Email) [ip@jahnlaw.com](mailto:ip@jahnlaw.com)  
(mailto:ip@jahnlaw.com)

---

## Nevada Office

200 S. Virginia St. 8th Floor  
Reno, NV 89501  
P: (Phone) (775) 771-3462  
E: (Email) [kirstin@jahnlaw.com](mailto:kirstin@jahnlaw.com)  
(mailto:kirstin@jahnlaw.com)

---

## Small Firm, Big Experience®

Copyright © 2014 Jahn + Associates, LLC. | A ToolStudios Website (<http://toolstudios.com>)



(<http://jahnlaw.com/>)

[HOME \(HTTP://JAHNLAW.COM/\)](http://jahnlaw.com/)

[AREAS OF PRACTICE \(HTTP://JAHNLAW.COM/AREAS-OF-PRACTICE/\)](http://jahnlaw.com/areas-of-practice/)

[CASES \(HTTP://JAHNLAW.COM/CASES/\)](http://jahnlaw.com/cases/)

[ABOUT \(HTTP://JAHNLAW.COM/ABOUT/\)](http://jahnlaw.com/about/)

[CONTACT \(HTTP://JAHNLAW.COM/CONTACT-US/\)](http://jahnlaw.com/contact-us/)



## Areas of Practice



### Counseling and Licensing

Legal counseling for individuals and business entities on all intellectual property matters including:

- Infringement matters
- IP portfolio review and management
- Due diligence
- Quality management and quality control

Licensing and negotiation for all types of Intellectual Property contracts:

- Patented technology
- Trade secret technology

- Copyrights
- Trademarks

- Providing monthly forecasts of expected workload, costs and expenses
- Associating with additional counsel to manage the workload if the case so warrants

- Artist
- Model

Trademark Fees (<http://jahnlaw.com/wp-content/uploads/2014/10/tm-fees-2014.docx>) (.docx)

---

### **Colorado Office**

1942 Broadway, Suite 314  
Boulder, CO 80302  
P: (Phone) (303) 545-5128  
E: (Email) [ip@jahnlaw.com](mailto:ip@jahnlaw.com)  
(<mailto:ip@jahnlaw.com>)

### **Nevada Office**

200 S. Virginia St. 8th Floor  
Reno, NV 89501  
P: (Phone) (775) 771-3462  
E: (Email) [kirstin@jahnlaw.com](mailto:kirstin@jahnlaw.com)  
(<mailto:kirstin@jahnlaw.com>)

### **Small Firm, Big Experience®**

---

---

Copyright © 2014 Jahn + Associates, LLC. | A ToolStudios Website (<http://toolstudios.com>)



(<http://jahnlaw.com/>)

[HOME \(HTTP://JAHNLAW.COM/\)](http://jahnlaw.com/)

[AREAS OF PRACTICE \(HTTP://JAHNLAW.COM/AREAS-OF-PRACTICE/\)](http://jahnlaw.com/areas-of-practice/)

[CASES \(HTTP://JAHNLAW.COM/CASES/\)](http://jahnlaw.com/cases/)

[ABOUT \(HTTP://JAHNLAW.COM/ABOUT/\)](http://jahnlaw.com/about/)

[CONTACT \(HTTP://JAHNLAW.COM/CONTACT-US/\)](http://jahnlaw.com/contact-us/)



### Microsoft v. i4i Limited Partnership

Under U.S. Supreme Court (<http://jahnlaw.com/category/u-s-supreme-court/>)

\_\_ U.S. \_\_\_, 131 S. Ct. 2238 (2011)

- Filed an Amicus Curie brief on behalf of AmiCour IP in support of i4i Limited Partnership who prevailed on appeal.
- Microsoft attempted to lower the standard to invalidate a patent from "clear and convincing" to "preponderance of the evidence"
- The AmiCour IP Amicus Curie brief was also cited in congressional testimony on May 21, 2014 by the Small Business Technology Counsel under the topic "Improvements to the Small Business Innovation Research Programs and Unleashing American Innovation."

### Categories

U.S. Supreme Court ( <a href="http://jahnlaw.com/category/u-s-supreme-court/">http://jahnlaw.com/category/u-s-supreme-court/</a> )	>
United States Circuit Court of Appeals ( <a href="http://jahnlaw.com/category/united-states-circuit-court-of-appeals/">http://jahnlaw.com/category/united-states-circuit-court-of-appeals/</a> )	>
United States District Court ( <a href="http://jahnlaw.com/category/united-states-district-court/">http://jahnlaw.com/category/united-states-district-court/</a> )	>

### Bechtel v. Admin. Review Bd., U.S. Dept of

## Labor et. al.

Under United States Circuit Court of Appeals (<http://jahnlaw.com/category/united-states-circuit-court-of-appeals/>)

710 F.3d. 443 (2nd Cir. 2013)

- Represented Scott Bechtel
- Appeal concerned a violation of the federal whistleblower statute

## Enterprise Management Ltd., Inc. et al v. Warrick

Under United States Circuit Court of Appeals (<http://jahnlaw.com/category/united-states-circuit-court-of-appeals/>)

717 F3d 1112 (10th Cir 2012)

- Copyright infringement action.
- Represented Plaintiff copyright holder – prevailed on appeal
- The 10th Circuit reversed and remanded the District Court, holding Dr. Lippitt's one page diagram on "Managing Complex Change" protectable.

## Burgess et. al. v. Gilman et. al.

Under United States Circuit Court of Appeals (<http://jahnlaw.com/category/united-states-circuit-court-of-appeals/>)

134 Fed. Appx. 200 (9th Cir. 2005)

- Represented Defendants
- Issue related to the grant of a preliminary injunction to use the famous "Mustang Ranch" trademark
- Plaintiffs argued the trademark was abandoned due to the U.S. Government's delay in selling the famous mark and business to Defendants
- Defendants prevailed at trial.

## Broadcast Music, Inc. et. al. v. B & D, LLC et. al.

Under United States District Court (<http://jahnlaw.com/category/united-states-district-court/>)

U.S. District Court, District of Colorado (2014)

- Represent Defendants
- Copyright infringement action

## Naturally Caffeinated, Inc. v. Contour Technologies, Inc.

Under United States District Court (<http://jahnlaw.com/category/united-states-district-court/>)

U.S. District Court, District of Colorado (2013)

- Represented Plaintiff
- Case involved a breach of an endorsement agreement
- Case settled

### **SalesBrain, LLC et. al. v. Teligent Corp. et. al.**

Under United States District Court (<http://jahnlaw.com/category/united-states-district-court/>)

U.S. District Court, Northern District of California (2013)

- Represented Plaintiff
- A copyright, trademark and breach of contract action
- Case settled

### **McConnell v. Microsoft Corp.**

Under United States District Court (<http://jahnlaw.com/category/united-states-district-court/>)

U.S. District Court, District of Colorado (2010)

- Represented Plaintiff
- Plaintiff brought a Declaratory Judgment action against Microsoft to render Microsoft's employment agreement void
- Case settled before Court ruling on the Motion for Preliminary Injunction after pending for 7 months

### **Lord Corporation v. Active Shock, Inc.**

Under United States District Court (<http://jahnlaw.com/category/united-states-district-court/>)

U.S. District Court, District of North Carolina, Western Division

- Represented Lord Corporation
- Patent infringement action involving three patents
- The case settled prior to claim construction

### **Corporate Visions, Inc. v. SalesBrain, LLC et. al.**

Under United States District Court (<http://jahnlaw.com/category/united-states-district-court/>)

U.S. District Court, Reno, NV (2009)

- Represented Defendants
- A copyright infringement, tradeseecret misappropriation, breach of contract action.
- The case settled prior to trial

### **TRI Marketing v. Mainstream Marketing Services, Inc.**

Under United States District Court (<http://jahnlaw.com/category/united-states-district-court/>)

2009 WL 1408741 (D. Minn. 2009)

- Represented Defendants
- A copyright infringement action
- Represented Defendant in motion to dismiss action because copyright registration had not issued at the time the suit was filed. This was an interesting case because the U.S. Circuit Court's of Appeal are split on the issue of whether a federal case can be brought after filing the copyright

application or whether one must wait for the copyright registration certificate to issue before filing suit. This makes it ripe for U.S. Supreme Court review.

## Phillips Performance Nutrition v. Bayer Healthcare, LLC

Under United States District Court (<http://jahnlaw.com/category/united-states-district-court/>)

U.S. District Court, District of Colorado (2008); 2008 WL 4079978 (D. Colo. 2008)

- Represented Plaintiff
- Declaratory Judgment action for determination that Plaintiffs "Phillips Performance Nutrition" mark for nutritional products did not infringe "Phillips" Milk of Magnesia mark
- Case settled

Page 1 of 3

1

2 (/cases/page/2/)

3 (/cases/page/3/)

» (/cases/page/2/)

### Colorado Office

1942 Broadway, Suite 314

Boulder, CO 80302

P: (Phone) (303) 545-5128

E: (Email) [ip@jahnlaw.com](mailto:ip@jahnlaw.com)

(<mailto:ip@jahnlaw.com>)

### Nevada Office

200 S. Virginia St. 8th Floor

Reno, NV 89501

P: (Phone) (775) 771-3462

E: (Email) [kirstin@jahnlaw.com](mailto:kirstin@jahnlaw.com)

(<mailto:kirstin@jahnlaw.com>)

### Small Firm, Big Experience®

Copyright © 2014 Jahn + Associates, LLC. | A ToolStudios Website (<http://toolstudios.com>)



(<http://jahnlaw.com/>)

[HOME \(HTTP://JAHNLAW.COM/\)](http://jahnlaw.com/)

[AREAS OF PRACTICE \(HTTP://JAHNLAW.COM/AREAS-OF-PRACTICE/\)](http://jahnlaw.com/areas-of-practice/)

[CASES \(HTTP://JAHNLAW.COM/CASES/\)](http://jahnlaw.com/cases/)

[ABOUT \(HTTP://JAHNLAW.COM/ABOUT/\)](http://jahnlaw.com/about/)

[CONTACT \(HTTP://JAHNLAW.COM/CONTACT-US/\)](http://jahnlaw.com/contact-us/)



**Fresh Perspective! We Keep It Simple.**

## Kirstin M. Jahn

Kirstin works closely with her clients to ensure the strategy developed, whether for IP protection, management, licensing or litigation, is considerate of the client's needs, finances and time. Working together with her client's Kirstin provides a fresh perspective on effectively handling large IP cases for the small to mid-size firm.

### Curriculum Vitae

Degrees
<ul style="list-style-type: none"> <li>◦ University of Buffalo School of Law, J.D. 1991 <i>Moot Court Member - National Competition</i></li> <li>◦ University of Massachusetts/Amherst, B.B.A. General Business &amp; Finance 1985 <i>Mortar Board Honor Society, Chapter President</i></li> </ul>
Other Studies

<b>Admissions</b>
<b>Arbitrator/Mediator</b>
<b>Publications</b>
<b>Seminars / Presentations</b>
<b>Membership / Committees / Pro Bono</b>
<b>Representative Clients</b>
<b>Registered with SBA as a Woman Owned Small Business</b>



## Our Areas of Practice



### Copyrights

A copyright protects original works of authorship fixed in a tangible medium of expression and includes, literary, musical, graphic, pictorial, graphic, sculptural, motion picture, audiovisual, sound recording, and architectural works.



### Trademarks

A trademark is a distinctive word, phrase, logo, or symbol used to identify goods or services. Trademark law prohibits the use of another's mark in a way that is likely to cause confusion as to the origin or sponsorship of the good or service.



### Patents

A patent protects an invention or discovery of a new and useful process, machine, manufacture, composition of matter or improvements thereof. Patent protection grants the inventor a controlled monopoly for a limited amount of time.

## Colorado Office

1942 Broadway, Suite 314  
 Boulder, CO 80302  
 P: (Phone) (303) 545-5128  
 E: (Email) [ip@jahnlaw.com](mailto:ip@jahnlaw.com)  
 (mailto:[ip@jahnlaw.com](mailto:ip@jahnlaw.com))

## Nevada Office

200 S. Virginia St. 8th Floor  
 Reno, NV 89501  
 P: (Phone) (775) 771-3462  
 E: (Email) [kirstin@jahnlaw.com](mailto:kirstin@jahnlaw.com)  
 (mailto:[kirstin@jahnlaw.com](mailto:kirstin@jahnlaw.com))

## Small Firm, Big Experience®



(<http://jahnlaw.com/>)

[HOME \(HTTP://JAHNLAW.COM/\)](http://jahnlaw.com/)

[AREAS OF PRACTICE \(HTTP://JAHNLAW.COM/AREAS-OF-PRACTICE/\)](http://jahnlaw.com/areas-of-practice/)

[CASES \(HTTP://JAHNLAW.COM/CASES/\)](http://jahnlaw.com/cases/)

[ABOUT \(HTTP://JAHNLAW.COM/ABOUT/\)](http://jahnlaw.com/about/)

[CONTACT \(HTTP://JAHNLAW.COM/CONTACT-US/\)](http://jahnlaw.com/contact-us/)



## Protect. Manage. Enforce. Defend.

Let us help you understand more about your Intellectual Property.

### Colorado Office

1942 Broadway, Suite 314  
Boulder, CO 80302  
P: (Phone) (303) 545-5128  
E: (Email) [ip@jahnlaw.com](mailto:ip@jahnlaw.com) (<mailto:ip@jahnlaw.com>)

### Nevada Office

200 S. Virginia St. 8th Floor  
Reno, NV 89501  
P: (Phone) (775) 771-3462  
E: (Email) [kirstin@jahnlaw.com](mailto:kirstin@jahnlaw.com) (<mailto:kirstin@jahnlaw.com>)

---

---

## Contact Us Today!

(<http://www.linkedin.com/pub/kirstin-jahn/22/751/107>)



(<http://www.linkedin.com/pub/kirstin-jahn/22/751/107>)

(<http://www.linkedin.com/pub/kirstin-jahn/22/751/107>)

---

### Colorado Office

1942 Broadway, Suite 314  
Boulder, CO 80302

P: (Phone) (303) 545-5128

E: (Email) [ip@jahnlaw.com](mailto:ip@jahnlaw.com)

(<mailto:ip@jahnlaw.com>)

### Nevada Office

200 S. Virginia St. 8th Floor  
Reno, NV 89501

P: (Phone) (775) 771-3462

E: (Email) [kirstin@jahnlaw.com](mailto:kirstin@jahnlaw.com)

(<mailto:kirstin@jahnlaw.com>)

### Small Firm, Big Experience®

---

Copyright © 2014 Jahn + Associates, LLC. | A ToolStudios Website (<http://toolstudios.com>)

# EXHIBIT 12

## The Talcott Law Firm PC (/)

Find me on <http://www.kdtalcott.com/>

[Home \(/\)](#)

[What I Can Do For You \(/What-I-Can-Do-For-You.html\)](#)

[Service Summary \(/Service-Summary.html\)](#)

[My Background \(/My-Background.html\)](#)

[News And Publications \(/News-And-Publications.html\)](#)

[Talcott's Patent Basics \(/Talcotts-Patent-Basics.html\)](#)

[Talcott's Trademark Basics \(/Talcotts-Trademark-Basics.html\)](#)

[File Sharing Subpoena Defense \(/File-Sharing-Subpoena-Defense.html\)](#)

[Bicycles \(/Bicycles.html\)](#)

[Contact \(/Contact.html\)](#)

[Terms Of Use And Privacy \(/Terms-Of-Use-And-Privacy.html\)](#)

### Big Firm Skills. Small Firm Service.

I have more than 20 years of experience in commercial law, with a particular focus on intellectual property. Having practiced for most of my career with large, multi-office law firms, I now offers clients big-firm expertise with the kind of personal attention, flexibility, and value that only a small firm can provide.

On this page I summarize the kinds of work that I do. I encourage you to look around my website. If you are a business owner or inventor and want to know more about some of the basics of intellectual property law, please check out my "Basics" pages. I've tried to write them with the non-lawyer in mind, and welcome your feedback as to whether I'm telling you what you need to know in a way that is clear and concise.

### Licenses, Agreements, Policies, and Procedures

I have advised clients ranging from individual inventors and entrepreneurs to large multinational corporations on a wide range of issues relating to intellectual property and technology law. In the past 12 months I have negotiated dozens of agreements for clients having a total value of well over \$5 million. My work has included prosecuting patent and trademark applications; negotiating intellectual property license and product development agreements; helping maintain and protect trade secrets; counseling on a broad range of copyright issues ranging from media content such as music, video, and print, to architectural drawings and computer software; helping companies plan and develop their intellectual property portfolios; conducting intellectual property due diligence in connection with loans, investments, mergers, and acquisitions; and helping clients develop systems, policies, and procedures to plan ahead for and manage electronic discovery. I am admitted to practice before the United States Patent and Trademark Office.

### Litigation and Dispute Resolution

My intellectual property litigation experience includes the initiation and defense of patent, trademark, copyright, and trade secret lawsuits. The cases I have worked on have have covered a wide range of technical subjects, including computer software, the Internet, semiconductor chips, semiconductor circuits, business methods, microencapsulated fluids, pharmaceutical chemicals; business communications systems, and electro-mechanical devices. I have been fortunate enough to have been involved in every aspect of litigation, from drafting the initial pleadings, seeking and defending against preliminary injunctions, conducting all phases of national and international discovery (including electronic discovery), motion practice, patent claim construction ("Markman") hearings, trials, and appeals. In addition to intellectual property and technology law, I have litigated in the areas of anti-counterfeiting, unfair competition, civil RICO, construction law, and business contracts. Many (but not all) of my non-intellectual property cases have had some technical aspect to them.

### Services for Startups

I began working with individual inventors and startup companies back during the "dot-com boom" of the late 1990s, and have continued doing so up to the present. I am well aware of the serious need my clients have to use their limited resources as efficiently as possible. In every situation my goal is to team with founders and company employees to identify and protect key intellectual property, whether by way of patent, trademark, copyright, or trade secrets. My experience includes creating and helping to implement internal protocols to protect company intellectual property in the form of employee non-disclosure and non-compete agreements, invention identification and assignment policies and procedures, trade secret identification and protection policies, and third-party non-disclosure agreements. I have also advised on the selection of corporate forms, and I provide incorporation services.

### Services for Lenders and Venture Capital and Early-Stage Investors

Frequently an insurer or an investor will want to know more about a target company's intellectual property. By providing that kind of analysis, I can help potential and existing company lenders and investors to evaluate the company's intellectual property, which helps them make key decisions about their investment choices. The work I do includes analyzing and evaluating target company intellectual property, conducting IP due diligence in connection with pending investments, perfecting security interests in intellectual property, helping identify potential investment targets, and evaluating and reportnig on pending IP-related litigation involving the target company.

### General Law Practice

My experience over the years has included work in a wide range of fields other than those described above. Please feel free to contact me to discuss how I can help you with your particular issue.

Attorney Advertising

CREATE A FREE WEBSITE ([HTTP://WWW.WEEBLY.COM/?UTM\\_SOURCE=INTERNAL&UTM\\_MEDIUM=FOOTER&UTM\\_CAMPAIGN=3](http://www.weebly.com/?utm_source=INTERNAL&utm_medium=FOOTER&utm_campaign=3))

POWERED BY ([HTTP://WWW.WIX.COM](http://www.wix.com))

HOME

ADVERTISING

SUBSCRIBE

BILLING

OUR TEAM

CONTACT

SEARCH THE SITE ...

NEWS

BUSINESS

SPORTS

EDUCATION

DINING & ENTERTAINMENT

# Boss, Arrighi & Hoag: A Small Law Firm With Big Firm Experience

July 20, 2013 by [Matt Wiley](#)

By Kathleen Schiop

Boss, Arrighi and Hoag, P.L. is a nine-year-old law firm with four locations in Florida – St. Petersburg, Sarasota, Vero Beach and the Tampa office, located in the Tampa Palms Professional Center off Commerce Park Blvd. (near the SpringHill Suites by Marriott hotel).

**New Tampa resident Brian Arrighi is the managing attorney at the Tampa office of Boss, Arrighi & Hoag, P.L., Tampa Palms.**

The firm, which includes eight full-time attorneys, can handle a wide variety of cases in any part of Florida, including business law (Chapter 11s, business debt & even BP Oil claims), criminal defense (including DUIs and sealing and expunging records), as well as wealth preservation and asset protection (personal bankruptcies, estate planning, Power of Attorney, probate, trusts, wills, foreclosure defense, short sales, tax law, etc.), family law (including divorces and child custody cases), personal injury law, insurance claim disputes and insurance litigation, sinkhole problems and especially real estate law – one of the specialties at Boss, Arrighi & Hoag's New Tampa office.

## Statewide-Reach, Local Roots

Attorney Brian D. Arrighi is a co-owner of the firm and the managing attorney for the Tampa location. He earned his B.S. degree from the University of Florida in Gainesville and his Juris Doctor (J.D.) law degree from the Stetson University College of Law in St. Petersburg. He is licensed to practice law in Florida and

before the U.S. District Court, Middle District of Florida. He also is a member of the Florida and Hillsborough County Bar Associations. Arrighi has been living in and practicing law in New Tampa since 2005.

"I've always recognized the potential for growth (in New Tampa), and I feel the area has been underserved in the aspect of choices for legal counsel," Arrighi explains. "Our firm also is a title company, and with all of the homes here, it was a good fit to try to expand our title services in this area."

Also primarily serving at the firm's Tampa office is associate attorney Matthew W. Kindel, who practices in all areas of family law and criminal defense. Prior to joining Boss, Arrighi & Hoag, Kindel was an Assistant State Attorney for the 10th Judicial Circuit Court in Polk County, advocating on behalf of the people of the State of Florida for more than three years.

Kindel is a Polk County native and lifelong Floridian who received his B.S. in Political Science from Florida Southern College in Lakeland and his law degree from Florida Coastal School of Law in Jacksonville. He is a graduate of the Hillsborough County Bar Association Leadership Institute, and has served on the Institute's Young Lawyer's Division Events Committee and Youth Services Committee. Kindel also has been involved with Lawyers for Literacy and has spoken to students about the law and the legal process.

## Recognizable Experience

As for the firm's other partners, who are not based primarily at the Tampa office, Christopher W. Boss is the managing partner of Boss, Arrighi, & Hoag, who practices primarily out of the firm's St. Petersburg office. Boss is a frequent lecturer on the areas of real estate and bankruptcy and he has spoken to numerous trade and industry organizations. He also is a periodic commentator and legal analyst on various real estate and bankruptcy matters, often interviewed by local media, including the WTVT-TV Fox Channel 13 and WTSP-TV Channel 10 news, WFLA-AM 970 (Fox News Radio)'s "Duncan Duo" radio show and numerous newspapers and magazines.

Boss received his undergraduate degree from Stetson University in DeLand, and his J.D. degree from Stetson University School of Law in St. Petersburg. Boss also teaches business law as an adjunct professor at the University of Tampa.

Brian M. Hoag joined Boss, Arrighi, & Hoag in January 2011 to lead the firm's litigation department. He represents clients in personal injury claims and wrongful death claims stemming from automobile accidents, premises liability, products liability, sinkhole claims, first- and third-party insurance claims and disputes and commercial litigation. Hoag obtained his undergraduate degree in finance, from Florida State University in Tallahassee, and his J.D. degree from the Stetson University College of Law, where he and Arrighi attended at the same time. While at Stetson, Hoag also earned his Master's of Business Administration degree.

## Title Services

[HOME](#)

[ADVERTISING](#)

[SUBSCRIBE](#)

[BILLING](#)

[OUR TEAM](#)

[CONTACT](#)

“Our firm is a title company, and a full-service legal firm, specializing in real estate – anything from development to residential home sales, we handle it,” Arrighi says. “I’m confident our short sale and foreclosure service is the best, but that’s not all we are. In Hillsborough and Pasco, the seller typically picks the title agency and pays for the services. We do the title work itself for the seller, for the same fee that everyone else does it for, but, in addition, we also give you a legal review of the contract. So, if any legal process comes up, you have an attorney right on hand.”

SEARCH THE SITE ...

He adds that, “We hold your hand throughout the home-selling process, versus the average title agency, who will tell you it’s time to find an attorney if something is beyond what they do. So we’re there offering it all in one nice little package for the same price.”

## Outstanding References

One New Tampa resident named Tracy who utilized Boss, Arrighi & Hoag had this to say about the firm: “Brian – We closed on our house and I wanted to say ‘thank you’ to you and your team for an amazing job. With all the horror stories you hear about short sales, ours just seemed to be painless with the support of you and your staff.”

Sue, a divorce client of Arrighi’s, said that he was more than helpful in handling her unique case. “My situation was a little out of the ordinary in that my ex and I are older, have three teenage children, and were dealing with my ex’s substance abuse, squandering family assets, plus monthly government pension check and disability income as opposed to ‘normal’ job-related income, etc. But, if (Brian) was surprised at my circumstances, he didn’t show it.

“However,” Sue continued, “there were times when he didn’t have answers to my questions, but he always told me he’d research them...and then delivered. He analyzed everything, and he came up with an amazing, creative plan that protected my unique situation.

“He’s straightforward, but rest assured: if the law isn’t being followed or there’s any game playing by the other side, he’s quick to counteract. He’s a family man himself and has compassion in abundance. I can’t say enough about him. Picking the right attorney is crucial...Brian Arrighi is not an expense – he’s an investment!”

Arrighi also says that at the Tampa Palms office, “Two or three of us are here pretty much most of the time, but the other attorneys will rotate in to handle different clients, depending on what they need. I’m always here, and Matthew Kindel handles most of our family law services at this office. I handle most of the consumer protection and business transactions, buying and selling businesses, contracts, disputes, setting

up the deals, forming the corporations. But if a client calls and says, 'I want to set up a will,' the attorney who handles that for our firm will be here and will see them here anytime they need to meet, so they never have to go outside their local area to work with us."

[HOME](#) [ADVERTISING](#) [SUBSCRIBE](#) [BILLING](#) [OUR TEAM](#) [CONTACT](#)

SEARCH THE SITE ...

Arrighi also notes that the local office has been handling "a lot" of foreclosures and short sales here in New Tampa and Wesley Chapel.

"Our standard client today is a homeowner who purchased in 2006, but then had a decrease in income and now, their home is underwater, they're spending their retirement savings to keep up with the bills and they don't know what to do," he explains. "Hopefully, they come to us before their situation becomes a crisis."

Another advantage of working with Boss, Arrighi and Hoag, Arrighi says, is that, "We have big- firm experience, but with small-firm customer service. The odds are that we can handle your case. If not, we'll know someone who can and will point you in the right direction with a referral."

The Tampa office also offers seminars for homeowners with distressed properties, as well as in the areas of family law and bankruptcy.

"We do the seminars right here, and we actually have one coming up on Saturday, August 10, 10:30 a.m. to noon," Arrighi explains. "At that seminar, we will be addressing what your options are if your home is 'underwater,' and how detailed we get depends upon the number of people attending. We discuss the options different banks offer, likely outcomes, and generally heighten awareness about the situation."

Arrighi adds that most people don't know what they're up against legally when it comes to a foreclosure or short sale.

"Unfortunately, there is a lot of bad information floating around," he says. "For example, there's a Debt Relief Act which is set to expire at the end of the year, which means that if you're going to short sale, you'd better do it before January 1, 2014. In some New Tampa communities, like in Live Oak Preserve, if you're, say, \$100,000 upside down, and you short sale now, you can get out of the debt, and you'll be fine. But, if you wait until January, that'll be a \$100,000 taxable gain. A lot of people don't know that. We're running out of time so we'll be pushing that, saying if you're going to short sale, and you've been on the fence about it, do it before January."

Perhaps the most important thing Arrighi stresses is that, "We want more people to not be afraid to call us. We want to be known as your neighborhood firm. I give out a lot of information on the consultation side, so we encourage you to contact us for a free consultation today. More than anything, we're a good firm. There are a lot of bad ones, out there, but we aren't... and we're local."

Boss, Arrighi, & Hoag, P.L.'s New Tampa office is located at 5321 Primrose Lake Cir., off Commerce Park Blvd. For your free consultation about any legal issue, or for more info, call 251-2921 or visit

[HOME](#) [ADVERTISING](#) [SUBSCRIBE](#) [BILLING](#) [OUR TEAM](#) [CONTACT](#)

[ProtectYourFuture.com](http://ProtectYourFuture.com).

SEARCH THE SITE ...

[Share on Facebook](#) [Share on Twitter](#) [Share on Google+](#)

Filed Under: [Business](#), [Business](#), [New Tampa](#), [Wesley Chapel](#)

### EVENTS CALENDAR

« MAY 2016 »						
M	T	W	T	F	S	S
			26	27	28	29
30	31	1	2	3	4	5

View all events [here](#).

Do you have an event to add to our community calendar? Submit your event:

[ADD EVENT](#)



### DINING & ENTERTAINMENT

[HOME](#)

[ADVERTISING](#)

[SUBSCRIBE](#)

[BILLING](#)

[OUR TEAM](#)

[CONTACT](#)



## Coming Soon: WCNT-TV!

May 24, 2016 By [John Cotey](#)



## Try Tarek's Café In Tampa Palms For Breakfast, Lunch & Dinner!

May 16, 2016 By [Gary Nager](#)



## Ginza Endless Sushi & Hibachi — Great Food & An Even Better Value!

May 10, 2016 By [Gary Nager](#)

[GET SOCIAL](#)

[LET'S TWEET](#)

HOME

ADVERTISING

SUBSCRIBE

BILLING

Tweets by @NTWCNews

OUR TEAM

CONTACT



Neighborhood News @NTWCNews

Wiregrass Ranch set for big moves in the future.

[ntneighborhoodnews.com/2016/05/wiregr...](http://ntneighborhoodnews.com/2016/05/wiregr...)

05 May



Neighborhood News @NTWCNews

[buff.ly/26ji766](http://buff.ly/26ji766)



22 Apr



Neighborhood News @NTWCNews

Today's the day. Good luck, fellas.

[buff.ly/1Svb7is](http://buff.ly/1Svb7is)



Embed

View on Twitter

### CONTACT US

Neighborhood News

(813) 910-2575

[info@ntneighborhoodnews.com](mailto:info@ntneighborhoodnews.com)

29157 Chapel Park Drive  
Wesley Chapel, FL 33543



### READ OUR NEWSPAPER

HOME

ADVERTISING

SUBSCRIBE

BILLING

CONTACT

NEW TAMPA **neighborhood** NEWS

Volume 24 Issue 5 February 20, 2016

INSIDER: **OUR TEAM**

**Named The 2014 'Small Business Of The Year' By The Wesley Chapel Chamber Of Commerce!**

The Direct-Mail News Magazine Serving New Tampa and Wesley Chapel Communities

### New Tampa Recreation Center Expansion Plans Put On Hold...Again

The new facility to be located at 11000 N. Dale Mabry Ave. in Wesley Chapel, Fla., was set to be completed in 2015, but has been delayed again. The Wesley Chapel Chamber of Commerce announced that the expansion plans for the recreation center have been put on hold once again.

The expansion project, which was approved by the city council in 2013, was set to be completed in 2015. However, the city council has now voted to delay the project until 2017. This decision was made after a lengthy public hearing and a review of the project's impact on the surrounding area.

The city council's decision was based on concerns raised by residents in the area. They expressed concerns about increased traffic, noise, and the potential impact on the local environment. The city council is now working to address these concerns and is expected to make a final decision on the project in the next few months.

Despite the delay, the city remains committed to providing a high-quality recreation facility for its residents. The city is currently exploring alternative options and is working to ensure that the project is completed as soon as possible.



SEARCH THE SITE ...

**Also Inside This Issue:**

**News, Business & Sports Updates**

**3rd Rotary Bike Ride To Benefit Vets To Be Held Mar. 19!**

**Wesley Chapel Subscription**

**New Tampa Subscription**

### SUBSCRIBE TO OUR NEWSLETTER

Email\*

- Wesley Chapel Subscription
- New Tampa Subscription

SUBSCRIBE


[Our Firm](#)
[Our Attorneys](#)
[Practice Areas](#)
[News & Information](#)
[Join BOL](#)
[Contact](#)

At Boren, Osher & Luftman LLP, we are committed to delivering legal services of the highest quality in the most creative, efficient and cost-effective manner possible. Our attorneys received their training and practiced law at some of the largest and most reputable firms in Los Angeles.

We established Boren, Osher & Luftman LLP, to provide more clients access to the expertise of a large firm, with the responsiveness and personal attention typically found at smaller firms. This combination of big firm experience and small firm treatment helps us attract and retain clients of all sizes, from the individual to the

small business owner to the large corporate client. We strive to create lasting personal relationships with our clients that allow us to remain responsive to their needs and to grow with them.



## BIG FIRM EXPERIENCE, SMALL FIRM TREATMENT



[Home](#) [Our Firm](#) [Our Team](#) [Our Cases](#) [Contact Us](#)

## Our Firm

Wide range of land use expertise

BIG firm talent, SMALL firm prices

Size and expertise easily integrate into all development teams

Responsive and available in today's digital age

Innovative approaches for real estate project approval

A productive and cost effective land use entitlement practice

The Pelosi Law Group is a boutique land use law firm focused on residential and commercial development in Northern and Central California. Founded in September 2011, the Pelosi Law Group brings big firm expertise to a small firm practice, providing personalized and focused attention to every project and matter. Clients at the Pelosi Law Group benefit from working with a highly qualified team of lawyers that can entitle land in an efficient, cost-effective fashion.

Our attorneys have over 40 years of combined experience with the California Environmental Quality Act (CEQA), planning and zoning laws, development agreements, Subdivision Map Act, natural resources permitting and other California laws that impact the use and development of real property. They have successfully obtained entitlements for dozens of large and small development projects throughout the state.

To learn more specifics about our practice click the links to the left.

560 Mission Street, Suite 2800  
San Francisco, CA, 94105  
(415) 273 9670

© 2015 Pelosi Law Group. All rights reserved



Call (408) 286-7333

[inquiry@richardburtlaw.com](mailto:inquiry@richardburtlaw.com)

**WITH HIS EXTENSIVE KNOWLEDGE, SKILL, AND EXPERIENCE**

**RICHARD BURT PROVIDES THE QUALITY OF A BIG FIRM**

**BUT WITH THE ATTENTIVENESS OF A SMALL FIRM.**



Richard G. Burt, Business Attorney and Counselor At Law

Richard G. Burt helps clients with forming business entities, such as corporations, partnerships, and limited liability companies (LLC's), negotiating contracts and agreements of various kinds, and with business and real estate transactions.



**BUSINESS ENTITY FORMATION**



**OUTSIDE GENERAL COUNSEL**



**BUY-SELL AGREEMENTS**

## San Jose Business Attorney

**Four Decades of Business Law Experience, from the SEC to Silicon Valley**

Richard Burt (JD, George Washington University, '73) began his legal career at the Securities and Exchange Commission in Washington, D.C., in 1973. Now an attorney rated "AV"\* "Preeminent" by Martindale-Hubbell, he heads his own law firm that serves the communities of the city of San Jose and of other cities in Santa Clara County, California as well as the rest of the San Francisco Bay Area. In the four intervening decades, Mr. Burt has garnered extensive legal experience at firms of various sizes: international commercial giant Wilmer Hale; the mid-sized Northern California firm Berliner Cohen; and, most recently, in practice for himself, after founding his own firm in 1984.

His firm now leverages this broad experience to provide boutique legal services in business matters and real estate matters to clients throughout California (as well as to out-of-state clients). The firm prides itself on providing to each client service of big-firm quality coupled with small-firm attentiveness. Whether the client is a large business enterprise, an entrepreneur just starting a business, or a professional in private practice, the firm has the ability to help.

### Richard Burt's Areas of Practice

**Business Entity Formation:** Mr. Burt organizes business entities, ranging from sole proprietorships and partnerships to corporations and limited liability companies (LLCs). His clients include existing businesses and startups, as well as founders of closely held companies, professionals, and investors in real estate. To learn more about this aspect of the firm's practice, click [here](#).

**Outside General Counsel:** Mr. Burt establishes relationships with existing businesses as well as with startups to provide ongoing outside general counsel. This allows both parties to establish a long-term counsel-client partnership based on mutual trust, and it provides the firm with an understanding of the particular needs and requirements of the client. Services provided under an outside-general-counsel arrangement can include review of standard

agreements, drafting contracts, reviewing financing documents, advising on, negotiating, and preparing agreements for the purchase or sale of a business (M&A). As outside general counsel, the firm also provides the service of finding experts in other legal areas when the client needs a specialist. Read more about these services [here](#).

**Buy-Sell Agreements:** A buy-out between co-owners of a business (including redemption of shares by the business entity) is often routine, but it can be the result of a tense, stressful negotiation. Mr. Burt is experienced in both these situations, and for those clients who wish to plan ahead, he helps avoid the disruption that a hostile buy-out negotiation causes by drafting a buy-sell agreement ahead of time. The firm chooses the most appropriate form of buy-sell agreement, taking into account such factors as the number of partners, the nature of the event that can trigger the purchase or sale, the value of the business, the method of payment (and security for a deferred payment), and many other complexities. For a longer discussion of the issues surrounding buy-sell agreements, click [here](#).

#### Richard Burt Understands the Legal Issues Silicon Valley Businesses Face

Mr. Burt offers the knowledge, skill, and experience needed to help clients navigate the legal complexities inherent in business matters, large and small. If you are looking for a lawyer, contact Mr. Burt at (408) 286-7333 or use the contact form [here](#) to schedule a consultation. (Please do not include any confidential information in your inquiry.)

\*A longer explanation of the Martindale-Hubbell rating system is available at the "[Peer Review Rating](#)" tab.

---



## RECENT POSTS

## Large Firm Representation at Small Firm Prices

Posted on **March 2, 2013**

Whether you're an individual, business, entrepreneur, or independent inventor, our top notch legal team will strive to meet all of your needs. Our various backgrounds and specialties combined with over 30 years of experience, allow us to provide large firm representation at small firm prices.

Innovative minds founded the Sorge Law Firm, LLC with one goal in mind – your success. Our mission is simple — to promote your success by providing superior representation and personalized services. Located in the city of Lawrenceburg, Indiana, 20 miles outside of Cincinnati, we can provide you with full service legal representation without having to pay the inflated, large firm costs.

[Continue reading →](#)

Posted in **Blog**

---

**View Our Services-**

LEAVE A REPLY

---

**How can we help your Business?-**

LEAVE A REPLY

---

**Can we assist in Personal legal matters?-**

LEAVE A REPLY

---

**Business Tax Services-**

LEAVE A REPLY

**Business Management and Optimization-**

LEAVE A REPLY

<a href="#">Home</a>	<a href="#">Lead Attorney</a>	<a href="#">Practice Areas</a>	<a href="#">Contact</a>	<a href="#">New Location</a>	<a href="#">Bankruptcy &amp; Debt Relief</a>
<a href="#">Oil &amp; Gas</a>	<a href="#">Real Estate &amp; Construction</a>	<a href="#">Contracts &amp; Commercial Litigation</a>			

# BRACKEN LAW FIRM, P.L.L.C.

## Small Firm Attention - Big Firm Results

*We provide the highest level of legal representation by taking a novel approach to the practice of law - we only measure our success based upon the success of our clients.*

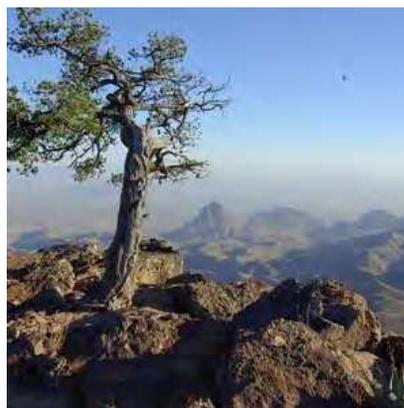


BRACKEN LAW FIRM, P.L.L.C., was founded to provide "big firm" experience and quality, but with the flexibility, cost-effectiveness and personal attention of a smaller firm. Our founder, Sean Paul Bracken, was formerly affiliated with large, prestigious, multinational law firms in Houston and New Orleans and successfully managed high profile cases. He strongly felt, however, that he could still achieve great results for his clients without a large firm's bureaucracy, extravagance, and antiquated approach to the practice of law. Accordingly, he launched his own firm with the success of clients as the first priority.

### Benefit From Our Experience

We have earned a reputation for excellence in the most complex litigation. Nevertheless, the goal of many of our clients is to resolve a matter without litigation. Our creative strategies, skilled negotiation, and deep understanding of the law have helped resolve matters quickly and economically without the need for litigation. With our years of experience, we develop the proper strategy to effectively serve the best interests of our clients.

Whether a large corporation or an individual, we work extra hard to provide our clients with the outstanding legal services that they deserve at a much more competitive price. We care about your business and we will never take a client for granted. We are available 24/7 to help you with all of your legal needs. Give us a call for your free initial consultation and experience a whole new level of legal service.



**Contact us today to schedule your FREE initial consultation at 406-493-1249.**



- ### Practice Areas
- [Real Estate / Construction](#)
  - [Contracts / Corporate / Litigation](#)
  - [Bankruptcy / Debt Relief](#)
  - [Divorce / Family Law](#)
  - [Insurance](#)
  - [Oil & Gas / Titles / Mineral Rights / Environmental](#)
  - [Admiralty / Maritime](#)
  - [Railroad / FELA / Jones Act Injuries](#)
  - [Wills & Trusts / Probate](#)

Austin, Texas

Houston, Texas

Missoula, Montana

Copyright © 2013

•  
•  
•

## **A large firm approach at a small firm price.**

### **Pasadena Employment Defense Law Firm Trade Secrets - Wage and Hour - Class Action Litigation**

The employment defense attorneys at the Brown Gitt Law Group, ALC, represent clients across the state of California and throughout the nation in a wide array of legal matters ranging from employment law and construction defects to business and commercial litigation. Our attorneys handle transactions and litigation as well as training and advice for the benefit of employers.

Our firm is distinguished in the legal community for our dedication to client service and history of proven results. Each of our attorneys has earned the distinction of Super Lawyer or Rising Star, and together our defense attorneys have more than 100 years of collective legal experience.

We are proud to assist clients in a wide range of essential legal services, including:

- Employment Law (Employers)
- Employment litigation
- Harassment and discrimination
- Trade secrets
- Wage and hour
- Class actions

- Labor law
- Business and commercial litigation
- Construction defects

Our attorneys have successfully represented clients in thousands of cases throughout their many years of legal practice. When we speak with clients about the value of our service, we feel confident in stating that we offer big-firm experience and quality at small-firm rates.

We are also proud of our quality of client service. We provide the highest standard of legal services that are dedicated, ethical and uniquely responsive to client needs. We are not a high-volume firm where your case will be lost in the cracks. At our firm, you will know your attorney, and he or she will know you. In each case we handle, whether it is litigation, transactions or general legal advice, our goal is to provide the best possible result for the people we serve.

## **Contact Us**

To learn more about our firm and our legal services, call our Pasadena, California, office or [contact a lawyer by e-mail](#).

### BLOG

---

300 North Lake Avenue, Suite 200  
Pasadena, California 91101

Toll Free: 888-309-8213  
Fax: 626-229-1917

Contact Us  
Pasadena Law Office

We represent clients in Pasadena, Glendale, Burbank, Los Angeles, San Diego, Newport Beach, Irvine, Santa Ana, Costa Mesa, Long Beach, Ventura, Santa Barbara, Ontario, Riverside, San Bernardino, Pomona, Anaheim,

Fullerton, Palm Springs, Bakersfield, Los Angeles County, Riverside County, San Bernardino County, Orange County, Ventura County, Santa Barbara County, San Diego County, Kern County, Southern California, San Gabriel Valley, San Fernando Valley, Inland Empire, Northern California and San Joaquin Valley.

Attorneys at this firm have been selected as Super Lawyers and Rising Stars.

© 2016 by [Brown Gitt Law Group, ALC](#). All rights reserved. [Disclaimer](#) | [Site Map](#)

[Privacy Policy](#) | [Business Development Solutions](#) by [FindLaw](#), a Thomson Reuters business.

# Christensen Law Group

Big firm experience. Small firm attention. Cost-effective results.

[CONTACT US](#)

- [Home](#)
- [Lawyers»](#)
- [Services](#)
- [Contact Us](#)

Search... 

## Proactive risk management, effective dispute resolution

Avoid the fights you can. Win the ones you can't.

[Previous](#)[Next](#)



### Who we are

CLG brings big firm experience, small firm attention, and cost-effective results to clients in the fields of employment law, insurance coverage, and commercial litigation. We help individuals and businesses to obtain compensation for legal wrongs, to avoid risks, and to resolve disputes in a fair and efficient manner.

Click "Contact CLG" for more information or to arrange a consultation.

### [News and Updates](#)

- [New discrimination regulations coming to California](#)
- [What to expect at work when you're expecting \(California edition\)](#)
- [Beat the summertime blues: Internships and employment law](#)
- [10 quick tips to limit the risk of an employment lawsuit](#)
- [Employers may owe for employees' personal cell phone use](#)

## Get in touch

- Phone 925.937.0800
- Email [casey@christensenlawgrp.com](mailto:casey@christensenlawgrp.com)

## Christensen Law Group

### Address

2603 Camino Ramon, Suite 385  
San Ramon, CA 94583 [Map](#)

This page is a message concerning availability for professional employment. All cases are different, and prior results do not guarantee that a particular outcome in a different matter.

Christensen Law Group © 2016. All Rights Reserved.

This site concerns availability for professional employment. This site and its contents are not legal advice. All cases are different, and past results do not guarantee any particular outcome in future matters.

[Main Index](#)[Attorneys](#)[Practice Areas](#)[Locations](#)[Contact](#)[Call 24/7: 1-888-400-9721](#)

## Call Catastrophic Injury Lawyers Now at 888-400-9721



### Size and Experience

- ★ Staff of Seasoned Professionals
- ★ Expert Affordable Legal Advice
- ★ Call the 24 Hour Attorney **Hotline 888-400-9721**

[CONTACT US](#)

## Discover the Ehline Law Difference – Small Firm Service, Big Firm Results

Search this website ...  Recommend   

### Get a Free Legal Consultation

**24 Hours a Day****Follow Us on Social Media Today:**

## Ehline Law Firm - Personal Injury Lawyers and Accident Attorneys

Ehline Law Firm PC delivers above average legal representation experience. Ehline's helped thousands of satisfied individuals badly physically maimed. Many cases involved injured Los Angeles accident victims. Ehline's helped people all over the State of California. Lawyers and paralegals help fill out all the forms and other documents. Staff helps with your insurance and medical claims.

Advantages mean you choose top injury lawyers at Ehline. Ehline offers multiple California locations to service clients locally. Many people find us after landing on our blog page. Professional focus means helping people on and offline. We are probably at a local destination near you. Questions? Call us.

Los Angeles injury victims get help in and out of court. We also help in 16 other locations in California. We help big cases and little cases. We assist families in many types of legal liability cases. Most arise from third party negligence or abuse.

The cases we seek are those involving maimed or confined clients who deserve money. Usually they can no longer work or make a living. We seek to ensure these individuals are represented properly. Construction site accidents generally fall into this category. Examples include being suffering a bad burn. Others include falling into an open trench. We have compassion for these afflicted individuals.

A lot of our past clients were victims of a slip fall accidents. Some involved dangerous premises, or dangerous sidewalks. Victims include pedestrians hurt in crosswalks. These cases include bicyclists. Some people walking across the street got run over by hit and run substance abusers. Examples of past cases include bus accidents when children are run over walking to school. Lawyers help wide swaths of consumers needing expertise and aggression. The worst type of cases we help with involve wrongful death.

Related matters include sexual assault and employment law matters. Landlord-tenant common area cases are common here. Los Angeles traffic accidents are among the most common cases at Ehline Law Firm PC. Since putting out our shingle in 2005, we have become world famous as "Masters of Disasters." And you need a personal injury lawyer like that to help deal with post accident expenses and overhead.

We've helped numerous individuals, families and business owners since we first opened our doors. As Los Angeles personal injury attorneys, we singularly represent victims and go after the people who negligently harmed them. It doesn't stop in L.A. We can even help if you need a San Diego, or Santa Monica car accident lawyer. You may need a motorcycle lawyer in San Francisco or a [wrongful death lawyer in San Bernardino](#) for a cruise ship

### Impressive Case Recovery

**Our Firm Has Won Over \$30 Million For Its Clients.** [\(Read More.\)](#)

### We Bend Over Backwards for

**For your convenience we offer:**

1. FREE Telephonic Case Consultation
2. FREE Home and Hospital Visits
3. Night and weekend appointments for injury cases requiring immediacy
4. A no Fees unless we win your case promise
5. Help with locating you proper emergency medical attention

- 3. Transportation arrangements to get to court, medical and legal appointments
- 7. We will also treat you with courtesy, compassion and respect

### Positive Reviews!

"...Two thumbs up and a salute to this distinguished gentleman. I guess the saying is true; if you want something done right the first time, send in the Marines! Oh Rahh" (Ryan Gangle)

### Resources

Before you do anything, read what to do immediately after an accident [here](#), and these [Personal Injury Attorney FAQ's](#).

San Francisco, Los Angeles, San Diego

### Impressive Case Results

▪	\$8,700,000.00 Confidential Settlement
▪	\$4,966,255.67 Confidential Settlement
▪	\$1,400,000.00 Confidential Settlement
▪	\$1,000,000.00 Faulty Traffic Signal
▪	\$950,000.00 Nursing Home/Elder Law
▪	\$750,000.00 Tour Bus Collision
▪	\$870,000.00 Confidential Settlement
▪	\$380,000.00 Single Vehicle Accident
▪	\$237,500.00 Nursing Home Abuse
▪	\$145,000.00 Auto/Pedestrian

accident. It doesn't matter what the injury or where you live. This is because we serve the whole State of California. No matter what, we are joined at the hip until your best victory.

### We Don't Get Paid Unless You Win:

We offer a free initial consultation. This helps to evaluate your potential case.

We don't charge any up front legal fees. We don't get paid unless we score a financial recovery for you.

We advance necessary costs of investigations. This means ordering accident investigation reports.

We can help locate lien doctors for your medical care while the claim is in process.

### Our Accident Lawyers

Michael Ehline is a former United States Marine. Him and the professional advocates at Ehline Law Firm PC have a take no prisoners attitude when it comes to winning. We work for a no recovery no fee retainer. This is also called a "contingency fee." Our honest and aggressive path means that we won't hesitate going toe to toe against inhuman insurance corporations. It also means that big businesses had better watch out. Our aim is to acquire significant restitution for every wounded consumer. Our ultimate wish is to see that injured underdogs thrive and survive with nobility when the uncaring caused them mental and physical harm.

In the pursuit of justice, our lawyers will not hesitate in submitting your case to a court trial. Ehline thinks that the liable faction be subject to negligence law and pay for his of her wrongful behavior. Cognizant of this fact, most defendants and their insurers intelligently wish to settle rather than tangle with our attorneys. Whether they grovel on the courthouse steps or plead to pay us due to a demand letter matters not to our attorneys. What matters is that we maximize the value of the case. Sooner or later, the defendant will be forced to pay or deal with the wrath of Ehline Law Firm PC.

### Awards and Client Recognition

The legal profession and our clients have consistently praised the superior and persistent performance of Ehline Law Firm PC and its aggressive advocates as being the best. Decorations we have received include numerous exhalations and strong praise.

**Our accolades include the following:** Selected as "Peer Rated" by the elite Martindale-Hubbell. Recognition given by the Marine Corps. Association. Michael Ehline has also been a guest speaker for the Orange County Paralegal's Association. Other accolades include International Personal Injury Warriors; Circle of Legal Trust, Best Attorneys in America, [Million Dollar Advocates Forum](#), [Superlawyers enrollment](#), [Avvo ratings](#), [Top 100 trial Lawyers](#), [National Trial Board of Regents Litigator Awards](#) and many others. Peruse more awards and [recognition here](#).

Proud as we are of the acknowledgement we have earned, our staff is most pleased with the outstanding jury verdicts and out of court settlements we have garnered. In fact, numerous cases have resulted in multiple millions of dollars in outcomes. ([Read more.](#))

### Categories of Personal Injury Cases We Are Dedicated to Help With

Ehline Law Firm's honest attorneys assist in a vast array of legal cases. If you are in LA, the statistics show you could be hurt. Our mainstay of cases arise from calamitous accidents that injured your health and mind. Spine injury and brain damage are the types of claims of the type we most often deal. Many of these mishaps are caused by the negligence and wrongdoing of inattentive, or malicious parties. Typical defendants we investigate and pursue are oath violating public servants, big corporations and private individuals. Client will retain us a wage earner was run over in a cross walk like in pedestrian accidents in the street at rush hour. Earnings and disability payments are not your only compensate-able loss. You will need accident help for your emotional distress and other distress.

Our mainstay of clients sustained traumatic injuries from auto accidents. Things like being thrown from a bicycle, or tossed in a bad motorcycle crash.

Other examples of claims we negotiate include big trucking and bus accidents. We have also been mentioned in the news about train accidents. We also help you get pay for work related injuries. This includes animal bites like dog assaults delivering packages and zoo injuries. Dangerous conditions on public property are also one of our specialties.

Being in Los Angeles we are requested as car accident lawyers as a top legal specialty. As you can see we don't just help with lawsuits involving vehicles. The list is too long to display here, but we these cases include boating accidents, airplane wrecks, cruise ship, slips and falls, products defects, premature death, elderly and nursing abuse and the list goes on. We even help with civil rights violations by law enforcement.

If you are unsure whether you have a case we can counsel you over the phone right now. Let's set up an attorney-client relationship. Make an appointment right now. Agents are standing by in English and in Spanish. If we cannot get a fair settlement it, we'll send it out to a trial attorney. If you hire us we can worry about your case while you heal. There are no limits to our aggressive representation in pursuit of your interests as a client.



## **Our Focus - Your Personal Injury Case**

The road to recovery after a significant accident isn't for the faint of heart. Our staff knows that your journey alone is often wrought with fear. Overwhelming hospital bills can crush you. Body shops and collections agents all pursuing you or your good credit is no fun.

Our job entails holding your hand and assisting you with proven strategies and tactics. This helps you to shield yourself. This in turn buys us time to pursue the often malevolent insurance companies. This will significantly aid us in obtaining their insured's maximum liability policy amounts. With us you have strength by your side. Now you can deal with the healing and grieving process. You can rest while we prepare your file for court.

## **What Happens Once I Contact Ehline?**

Cases are unique just like you. The totality of circumstances must be weighed. The case must be examined and compared with other similar fact patterns and their outcomes. This helps our experts get baselines on the case value. Only then will we know how to proceed. This tactic helps especially helpful in auto accident cases. These claims are especially unique in their mechanisms of impact and injury. Are you starting to see why it's so important to get help from a legal pro?

There is simply no reason for you to fear anything. Pick up the phone today speak to one of the best lawyers in town. Attorneys or case intake specialists in areas near you are standing by right now.

## **How Much Money Does Ehline Charge for a Case Evaluation?**

The initial case evaluation you will receive will always be cost free to you. If you have a question right now you can fill out our form right now. The free consultation was designed to help potential new clients like you understand the merits and risks. Explaining the legal process helps to put you at ease during this time of tribulation. Knowing your options means choices.

Educated choices are very important when you are vulnerable. Only trained legal experts are in a position to really hear what you have to say. Talking with licensed members of the bar means that you are shielded by attorney-client privilege and confidentiality.

This means there's little risk in opening up to us. That's why we're called "legal counselors." Give us a call right now. Get that free legal consultation today.

## **What If I Want To Hire Ehline Law Firm For My Accident Case?**

You may want to think on retaining our services after our talk. Don't procrastinate further. Take action on our offer. We'll provide you the excellent service you are seeking. Ehline Law Firm acts quickly by drawing up a legal document called a retainer.

We'll also explain the various provisions line by line. You'll also be afforded an opportunity to have documents reviewed by counsel of your choice. You will have time to review past client testimonials as well. That way you can consent after consultation. Both parties (Ehline's representative and you) will execute the documents with signatures. The contract will then set in stone. Once that occurs we take over the tactical aspects of your case. We will deal with defendant's insurance company. We help get you paid.

## **Administering Your Injury Claim File**

Immediately after the retainer is signed we go to work. We start by delegating your file to our dedicated staff. This may include a battery of attorneys. It also may entail deploying paralegals. We will also delegate administrative aspects of your case to our legal secretaries and law clerks.

Working in unison means being victorious. We're like well trained Marines. Your case becomes a symphony of action. We'll respond promptly to your phone calls. We'll follow up on emails. We'll also promptly answer questions that come up from time to time in such a delicate matter.

We'll keep you fully informed along the way lickety-split. We invite your input as part of the strategic decision making process. We want you to get healed. We'll also help you mitigate your losses. Examples of help we give include assisting you in locating lien doctors willing to treat you immediately.

This means getting the best medial care now. But it's a lien. This means you pay your doctors and care providers at the conclusion of your case.

### Getting Well is Your Job - Our Job is Cutting the Red Tape

The main burden for you means working on getting well. We want you to convalesce. You do your business with physical therapy and recuperation. Simultaneously, our staff of personal injury experts will be battling nose to nose with hostile insurance companies.

All this time we keep heat on the city clerks and law enforcement to get you public records if they are relevant to your case. We'll stay on top of the medical facilities to get your records. Records we seek include things like bills from ambulance companies. Sometime we may have to go after your old boss at work too.

Anyone that may stand in our way of achieving the best results for your case is to be rooted out with finesse and drive. We brush aside the obstacles because we know the codes. We understand and memorize rules of court and procedure. We know the opposition's tactics. We also know how to neutralize them or use them in your favor.

### What Should You Do Next?

You should not wait a single moment. Don't sleep on your legal rights. What you should do is get active and reach out today. We promise you big firm results with small firm service. Make that toll free call now at 888.400.9721 and see for yourself why people are talking about our terrific legal services for yourself.



#### Quick Reference:

- [About Us](#)
- [Results](#)
- [Recognition & Awards](#)
- [What Our Clients Think](#)
- [Safety Blog](#)

#### Find Us On Social Media

#### Greater L.A.

Ehline Law Firm PC  
 633 West 5th Street #2890, Los Angeles, CA 90071  
 (213) 596-9642

#### Hours

Mon-Fri: 10am-7pm  
 Sat-Sun: Closed  
 By appointment only.

#### Email

Michael Ehline - michael@ehlinelaw.com

#### More Areas of Law

- [Slip and Falls](#)
- [Dog Bites](#)
- [Defective Products](#)
- [Malpractice Claims](#)
- [Civil Rights](#)

#### Legal Tips:

- [Importance of a Legal Consultation](#)
- [Don't Waive Your Injury Claims By Sleeping on Your Rights!](#)
- [Is Self Representation an Option in Small Cases?](#)
- [Help With Rainy Day Accidents](#)
- [Are Attorney Rating Sites Reliable?](#)

### Convenient Locations Near You

- Bakersfield
- Campbell
- Carlsbad
- Irvine
- Riverside
- San Bernardino
- San Francisco
- San Diego
- Temecula
- Huntington Beach
- Laguna
- Long Beach
- Greater Los Angeles
- Marina del Rey
- Newport Beach
- Santa Monica
- Torrance

**Don't forget to ask about our  
military discounts.**

---

Ehline Law Firm PC

# Gettman & Mills LLP

## Omaha Commercial Litigation Lawyers

---

### Gettman & Mills LLP | Small Firm Values, Big Firm Resources

Established in Omaha, Nebraska, [Gettman & Mills LLP](#) represents individuals, business owners and Fortune 500 companies in complex business law and commercial litigation matters.

Unlike many law firms that charge expensive attorneys fees while undercutting the value of their services, we are committed to providing effective legal assistance at realistic rates.

### Experienced and Competent Nebraska Business Disputes Attorneys

Our team of Omaha commercial litigation attorneys, led by managing partner Jill Vinjamuri Gettman, offers our clients more than 50 combined years of legal experience successfully handling business law and commercial litigation cases. Our main areas of focus are:

- **Business law and litigation:** Our firm has represented Fortune 500 companies and small businesses in a variety of disputes involving:
  - Shareholders
  - Vendors
  - Customers
  - Contracts
  - Employment
  - Trade
- **Insurance coverage:** Partner Michael J. Mills and our team of lawyers skillfully represent policyholders in insurance coverage disputes involving professional liability policies, employment practices liability, directors and officers liability, fiduciary liability, commercial auto insurance, commercial general liability, etc. We also help policyholders with:
  - Structuring insurance programs
  - Handling coverage issues that arise in claims
  - Risk management issues
- **Product liability defense:** For more than a decade, Jill Vinjamuri Gettman has represented an international pharmaceutical company in hundreds of national cases. Our firm offers expertise in management of large-scale national products cases for our business clients.

### Contact Gettman & Mills LLP Today

We invite you to contact Gettman & Mills LLP today at 800-260-7336, or [e-mail us](#), for a confidential consultation regarding your business, insurance coverage and product liability defense needs. We are based in Omaha, Nebraska, but represent clients statewide and nationally. Our office hours are 8 a.m. to 5 p.m. Monday through Friday and evenings and weekends by special appointment. **We offer big firm experience at small firm rates.**

---

#### Contact

---

**Gettman & Mills LLP**  
10250 Regency Circle, Suite 105  
Omaha, NE 68114  
Phone: 800-260-7336  
Fax: 402-391-6500  
[Map and Directions](#)

---

Copyright © 2016 by [Gettman & Mills LLP](#). All rights reserved. [Disclaimer](#) | [Site Map](#)

[Main Menu](#)

Search our site



Tulsa and Northeast OK area:

**918-928-8941**

**Large Firm Experience**  
**Small Firm Values**

Practice Areas

## Professional Estate And Business Planning Law Firm

Whether it's running your business or balancing family obligations, there simply are not enough hours in the day to do it all. You recognize the importance of proper business and estate planning, but find it challenging to achieve more than the management of day-to-day responsibilities. Knowing an experienced attorney on a first-name basis can

be a solution to many of these struggles. A professional attorney who knows your business and family situations is a valuable asset – someone who will assist with the issues you face today while protecting your business and family in the future.

## Large-Firm Experience | Small-Firm Values

At Helton Law Firm, we provide legal counsel for all your business and personal needs. We offer comprehensive estate planning services tailored specifically to your family's goals. Helton Law Firm also has significant experience handling complex business transactions and commercial litigation matters. We combine experience winning large, complicated cases at some of Tulsa's biggest law firms with the accessibility, attentiveness and personalized service of a small boutique firm. This allows Helton Law Firm to build lasting relationships with our clients and provide strong legal counsel on a wide range of matters.

Our firm is an effective and efficient resource when addressing the following:

### Estate Planning

- Wills and Trusts
- Durable Power of Attorney
- Guardianships
- Probate and Trust Administration

### Business Transactions

- Corporate transactions, including contract preparation, review and negotiation
- Mergers and Acquisitions
- Shareholder Agreements
- Real Estate
- Business Start Ups
- Sale and dissolution of a business

### Commercial Litigation

- Partner Disputes

- Collections
- Contract Disputes
- Construction
- Real Estate
- Title Disputes
- Workers Compensation Defense
- Tax Lien Defense

## **Additional Areas of Practice**

- Trust Administration
- Corporate Transactions – bylaws, shareholder agreements
- Oil and Gas Transactions
- Oil and Gas Litigation
- Real Estate Transactions
- Real Estate Litigation
- Homeowner and Condo Associations
- HIPAA – medical compliance
- FDCPA, TCPA Defense
- Business Collections
- Products Liability
- Personal Injury

## **Take The First Step Toward Securing Future Success**

To speak with an experienced estate and business planning lawyer, contact Helton Law Firm and schedule an informational meeting at 918-928-8941 or complete our [online contact form](#). We proudly represent clients in Tulsa and throughout Oklahoma.

**Super Lawyers**

Super Lawyers, 2009 – 2014



---

## REQUEST OUR SERVICES

Fill out the form and we'll be in touch with you shortly, or call us directly at **918-928-8941**

Name

**Email Address**

Phone

Brief description of your legal issue

I have read the [disclaimer](#). [Privacy Policy](#)

**CONTACT OUR FIRM**



### Helton Law Firm Location

7447 S. Lewis Ave.

Tulsa, OK 74136

[Map & Directions](#)

Phone: 918-928-8941

Fax: 918-710-3930





Helton Law Firm proudly represents clients in Tulsa, Broken Arrow, Sapulpa, Owasso, Bixby, Jenks, Glenpool and Sand Springs and throughout Oklahoma.

---

© 2016 by [Helton Law Firm](#). All rights reserved. [Disclaimer](#) | [Site Map](#) [Privacy Policy](#) | [Business Development Solutions](#) by [FindLaw](#), a Thomson Reuters business.

BACK TO TOP



# JOHNSON & CASSIDY

ATTORNEYS AT LAW

[FIRM](#)

[ATTORNEYS](#)

[PRACTICES](#)

[INSIGHTS](#)

[CONTACT](#)



[FIRM](#) | [ATTORNEYS](#) | [PRACTICES](#) | [TECHNOLOGY](#) | [CONTACT](#)

Copyright © 2014 | Johnson & Cassidy, P.A. | Website by Vividivity, LLC

f in

# KG&G

KAVANAGH GRUMLEY & GORBOLD, LLC

[HOME](#)[FIRM](#)[ATTORNEYS](#)[PRACTICE AREAS](#)[CONTACT](#)

815-727-4511



## EXPERIENCE, ATTENTIVENESS, TENACITY

In each area of law we practice, for each case we take, for each client we represent, we focus on forming personal relationships and offering the highest degree providing tailored representation that meets each client's needs.

### INDIVIDUALS

Contact us to assist you with:

Divorce, Child custody, Visitation and Support  
 Orders of protection  
 Adoption  
 Wills & Trusts  
 Probate & probate litigation  
 Real estate  
 Zoning & Variances  
 Personal injury claims  
 Lawsuit filed against you  
 Criminal charges  
 DUIs & traffic tickets  
 License suspension  
 Appeals

### BUSINESSES

Our legal guidance allows you to focus on running your business.

Forming a legal entity  
 Drafting by-laws  
 Buying & selling property  
 Zoning  
 Labor & employment issues  
 Employee handbooks  
 Drafting contracts  
 Contract disputes  
 Wage claims  
 Workers compensation  
 Construction  
 Mechanics liens  
 Injunctions  
 Appeals

### INSURERS

Insurers rely on us both to defend their insureds against claims and to represent them in coverage disputes with insureds and other insurers.

Medical Negligence (physician, clinic, & hospital)  
 Nursing home defense  
 Vehicular accidents  
 Premises liability  
 Property damage  
 Professional negligence  
 Coverage disputes  
 Defamation  
 Workplace injuries  
 Negligent misrepresentation  
 Subrogation claims  
 Appeals

### GC

We represent entities, includ villages, as we and fire and p aspects, includ

Litigation defe  
 Prosecution o  
 Drafting ordin  
 Employment i  
 Zoning  
 Eminent dom:  
 Election proce  
 Purchase & sa  
 General coun:  
 Appeals

## WILL COUNTY'S FULL SERVICE LAW FIRM FOR ALL OF YOUR LEGAL NEEDS





**Leading Lawyers™**  
*Find a better lawyer, faster.™*

**emerging lawyers™**  
*on a fast track to the top*

**LCA Super Law**  
PROVEN TRIAL LAWYERS



**KG&G**  
KAVANAGH GRUMLEY & GORBOLD, LLC

111 N. Ottawa Street Joliet, IL 60432  
Phone: **815-727-4511** Fax: **815-727-1586**  
Email: [info@kggllc.com](mailto:info@kggllc.com)

[Home](#) | [Firm](#) | [Attorneys](#) | [Practi](#)  
© 2016 by Kavanagh Grumley & Go  
[Disclaimer](#) | [Site Map](#)

## Maxwell Hesse Group LLC

CPAs for Closely-held Businesses, Owners, Investors and the Self-Employed

- [Home](#)
- [About Us](#)
- [Services](#)
- [Our People](#)
- [Directions](#)
- [Resources](#)
- [Contact](#)



### Big Firm Experience, Small Company Service

• We have all worked at a big firm; that's why we're at a small firm (our little office is in the photo). We enjoy the immediate and personal client relationships that grow at a small firm. And you will appreciate the professionalism and sophisticated tax and business knowledge we brought along from our days at the big firm. You get the best of both.



The Maxwell Hesse Group, LLC is a team of three professionals with over 70 years of combined service to businesses and their owners. We help enterprises become more successful by knowing our clients and their goals and then providing advice and compliance services to help reach those goals.

Our practice consists of business entities (S corporations, C corporations, partnerships, LLC's) and individual clients. We provide financial statement review and compilation, income tax planning and preparation, estate planning and estate tax returns, litigation support, and financial and management consulting.

We currently serve businesses with sales of less than \$100,000 to more than \$10 million, as well as numerous professionals and other individuals needing tax and advisory services. The Maxwell Hesse Group, LLC formed in January, 2003 when Lori Hesse joined J.L. Maxwell and Company, CPA's.

The Maxwell Hesse Group, LLC supports the community through assistance to local nonprofits such as Oregon Children's Theatre Company and The Pangaea Project.

#### **Maxwell Hesse Group LLC**

7929 SW 37th Avenue, Suite B  
Portland, Oregon 97219  
tel: (503) 227-2263  
fax: (503) 227-6064  
[group@maxwellhesse.com](mailto:group@maxwellhesse.com)

### **We're Easy to Find**

Our office is in the heart of historic Multnomah Village. For detailed a map and directions [click here](#).

### **Helpful Links**

[Internal Revenue Service](#)

[Retirement Plan Contribution Info from IRS](#)

[Small Business Retirement Plan Resources](#)

[Oregon Department of Revenue](#)

[Make Sound Financial Decisions](#)

[Return to top of page](#)

Copyright © 2016 · [Delicious Theme](#) · [WordPress](#) · site design: [Millimeter Design](#) · [Log in](#)

THIS IS AN ADVERTISEMENT

[Home \(/\)](#)   [Attorney Profile \(/attorney-profile.html\)](/attorney-profile.html)   [Practice Areas \(/practice-areas.html\)](/practice-areas.html)   [Resources \(/resources.html\)](/resources.html)

## Seeking Justice for Plaintiffs - Enforcing Plaintiff's Rights

### Trial attorney brings more than two decades of experience

Paul J. Smoot is proud to say he is a plaintiff's attorney. Paul Smoot continues to ensure plaintiffs obtain justice and fair compensation. We are dedicated to making a real difference in the lives of people grappling with serious, potentially life-altering legal matters. We know that our "boutique" approach enhances efficiency and attention to detail and that it encourages accessibility and better communications: We aim to return your call as quickly as possible—but in any event within 24 hours—and we are happy to provide you with regular progress reports as your matter moves forward.

### A small firm with big experience

Firm founder and principal Paul J. Smoot brings the experience, knowledge and skill of more than 20 years to his work for each client. Among past clients are former San Francisco Mayor Joseph L. Alioto and Angela Alioto, small companies and their founders who have been wronged, technology companies such as OCZ Technology Group, Inc. and PeerTrainer.com. Recently, after extended litigation against Vinod Khosla and Khosla Ventures, we had their counsel of record, Wilson, Sonsini, Goodrich & Rosati disqualified as counsel of record.

Mr. Smoot has been nominated and voted [Super Lawyer®](http://www.superlawyers.com/) (<http://www.superlawyers.com/>) every year from 2008 through 2013. This is a distinction for the Top 5% of attorneys in California. Mr. Smoot has been a member of the Consumer Attorneys of California since 1993 and is a past president of the San Mateo County Trial Lawyers Association and San Mateo County Barristers. The experienced legal advocate has been recognized for his many achievements by both peers and clients. He is [BV® Distinguished™ Peer Review Rated](#) ([http://www.martindale.com/Products\\_and\\_Services/Peer\\_Review\\_Ratings.aspx](http://www.martindale.com/Products_and_Services/Peer_Review_Ratings.aspx)) by Martindale-Hubbell® for his professionalism and ethics.

### Representing clients in several areas of law

We have successfully represented individuals in a wide range of legal matters, including:

**Personal Injury** — We represent plaintiffs who are injured as a result of a serious auto accident, medical malpractice, an unsafe product (such as a drug), a slip-and-fall, or unsafe work conditions. If you have lost a loved one because of any of these, we litigate your wrongful-death case.

**Employment Law** — We represent plaintiffs in wage-and-hour, age, sex and gender discrimination, defamation, unemployment, workplace violations, unsafe work conditions, whistleblower retaliation and wrongful-termination disputes.

**Elder Law** — We represent you or your loved one in elder issues including abuse, wills and trusts, Social Security benefits, Medicare and Medicaid coverage, nursing home and assisted living care, medical directives and living wills.

### Contact the Law Offices of Paul J. Smoot

Peninsula residents requiring legal services, counsel and representation are invited to contact the Law Offices of Paul J.

## Practice Areas

- [Personal Injury \(/personal-injury.html\)](/personal-injury.html)
- [Employment Law \(/employment-law.html\)](/employment-law.html)
- [Elder Law \(/elder-law.html\)](/elder-law.html)

## Office Location

### Smoot, P.C.

Paul J. Smoot  
1720 South Amphlett Boulevard  
Suite 104  
San Mateo, CA 94402  
**Telephone:** 650-548-0900

[View Map \(/office-location.html\)](/office-location.html) | [Contact Us \(/contact-us.html\)](/contact-us.html)

([http://www.superlawyers.com/redirect?url=http://www.superlawyers.com/california-northern/lawyer/Paul-J-Smoot/729c6e2d-9223-4b40-b861-8b1eab292b51.html&c=basic\\_largeblue\\_badge&i=9223-4b40-b861-8b1eab292b51](http://www.superlawyers.com/redirect?url=http://www.superlawyers.com/california-northern/lawyer/Paul-J-Smoot/729c6e2d-9223-4b40-b861-8b1eab292b51.html&c=basic_largeblue_badge&i=9223-4b40-b861-8b1eab292b51))

**Paul J. Smoot**  
**([http://www.superlawyers.com/redirect?url=http://www.superlawyers.com/california-northern/lawyer/Paul-J-Smoot/729c6e2d-9223-4b40-b861-8b1eab292b51.html&c=basic\\_largeblue\\_badge&i=9223-4b40-b861-8b1eab292b51](http://www.superlawyers.com/redirect?url=http://www.superlawyers.com/california-northern/lawyer/Paul-J-Smoot/729c6e2d-9223-4b40-b861-8b1eab292b51.html&c=basic_largeblue_badge&i=9223-4b40-b861-8b1eab292b51))**

855.396.4234

[PRACTICE AREAS](#)   [OUR PEOPLE](#)   [WHY US](#)   [BLOG](#)   [CONTACT US](#)

# BIG FIRM EXPERIENCE WITH A PERSONAL TOUCH.

[LEARN ABOUT US](#)

## PRACTICE AREAS



## 40 YEARS IN BUSINESS. THOUSANDS OF CLIENTS. MILLIONS RECOVERED ANNUALLY.

Our law firm is built on a commitment to honest counsel, aggressive representation and client responsiveness. Through our offices on Madison Avenue in the heart of Midtown Manhattan and Northern New Jersey, our attorneys provide superior legal services to clients ranging from small businesses and Fortune 500 Corporations, to wrongfully injured accident victims.

[LEARN ABOUT US](#)

### FROM THE BLOG

## Zillow Trade Secret Theft Case Highlights The Need for Strong Noncompete Agreements With Key Executives

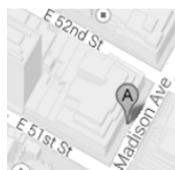
The recent case unfolding in public and generating significant negative publicity involves a bitter dispute between online real estate titans Zillow and Realtor.com. It also highlights the lengths to which former employees will go to cover their tracks after taking trade secrets from a previous employer to compete at a new company.

[LEARN MORE](#)



### New Jersey Office

395 West Passaic Street  
Suite 205  
Rochelle Park, NJ 07662  
Phone: (201) 820-6001  
Fax: (201) 226-0795



### New York Office

488 Madison Avenue  
24th Fl  
New York, NY 10022  
Phone: (212) 692-0200  
Fax: (212) 692-0202

FOLLOW US



STAY UPDATED

[SIGN UP](#)

© Copyright 2015 Tenaglia & Hunt, P.A. All Rights Reserved.

[Privacy Policy](#) / [Terms & Conditions](#)

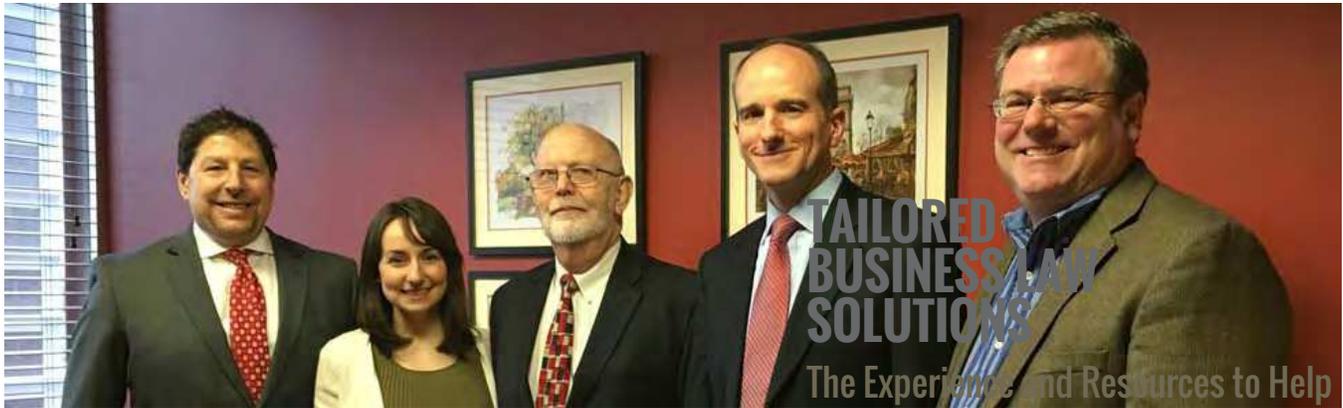


VALENTI HANLEY  
— PLLC —

[Home](#) [Firm overview](#) [Attorneys](#) [Practice areas](#) [Contact](#)

THIS IS AN ADVERTISEMENT

**502-410-3882 | 866-617-6209**



## COMBINING LARGE-FIRM EXPERIENCE WITH SMALL-FIRM ATTENTION

At Valenti Hanley PLLC, we provide the sophisticated and experienced representation of a large firm with the individualized and attentive service of a small firm. Our team of business law attorneys offers an impressive background of large-firm experience and high-quality education. We frame this skilled representation with small-firm care and attention.

We take the time to understand your business's unique goals and priorities. With our size, we are able to tailor legal advice

### How can we help?

**Bold** labels are required.

Name Brief description of your legal issue

**E-mail Address**

Phone

**I have read the [disclaimer](#).**

[Privacy Policy](#)

[Send Us An Email](#)

### Office Location

#### VALENTI HANLEY PLLC

401 West Main Street Suite 1950 Louisville, KY 40202

tf: 866-617-6209 ph: 502-410-3882 fx: 502-568-2101 [Directions](#)

that meets those objectives in a cost-effective manner.

To arrange a consultation to discuss your case with our experienced team, please [contact our Louisville office](#) today at 502-410-3882 or toll free at 866-617-6209.

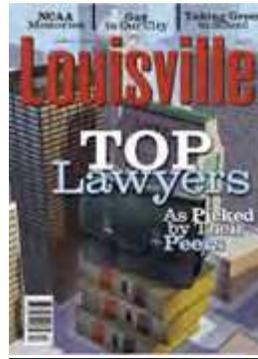
## Comprehensive Business Law Services

We do not attempt to be everything to everyone. We have the resources and bandwidth, however, to represent out-of-state clients locally in [business disputes](#) within the state of Kentucky. We are able to provide useful and knowledgeable service, overseeing the protection of our clients' interests at every stage.

We represent a comprehensive range of businesses and individuals positioned in a variety of industries and professions in whatever business law disputes they may encounter, from basic [contract disputes](#) to, for example, more [sophisticated securities law matters](#).

## Strategies Tailored To Meet Your Needs

Our representation is closely tailored to the exact needs and business objectives of our clients. We invest the time to develop a keen understanding of those goals, and it becomes our business to advance your interests through focused legal guidance. Through critical thinking and attention to detail, we will keep the case headed towards an efficient and cost-effective solution. When possible, we will resolve the case early through negotiation or mediation. If an advantageous outcome is unavailable by these means, however, we are a litigation firm ready to take the matter to court.



We work within the budgetary constraints of our clients, providing manageable fees. Our small size allows us to keep overhead costs low and focus our clients' resources directly toward the legal concern at hand.

Super Lawyers



502-568-2100 | 866-617-6209

© 2016 by [Valenti Hanley PLLC](#). All rights reserved. [Disclaimer](#) | [Site Map](#) [Privacy Policy](#) | [Business Development Solutions](#) by [FindLaw](#), a Thomson Reuters business.



VALENTI HANLEY  
— PLLC —

# Vick Law Group APC

## Los Angeles Securities Litigation Law Firm

### Large Firm Experience · Small Firm Attention

At Vick Law Group, a boutique securities litigation law firm in Los Angeles, California, we are hands-on advocates with proven track records. Our [practice](#) is devoted exclusively to securities law, SEC and PCAOB investigations, and civil litigation. We combine the high level of sophistication of a large firm with the unparalleled client service, individualized attention and cost-effectiveness of a small firm.

At VLG, we believe that a cookie-cutter approach to the law is never sufficient. We understand that every client — and every legal matter — is unique. Successfully resolving complex cases requires a custom-tailored approach that takes into account clients' unique legal needs, financial resources and business objectives. We invest the time, effort and resources to provide innovative legal solutions and practical, results-oriented strategies.

Our firm is founded on a passion for excellence. We take pride in our commitment to quality legal representation, attention to detail and unparalleled client service.

### What Sets Us Apart

Our extensive experience provides us with a solid foundation for capably handling the most complex civil litigation and corporate securities matters. Our founding attorney, Scott Vick, has nearly two decades of experience, including eight years of experience as a partner at a large international law firm. He has been selected for inclusion in California Super Lawyers for five years. Additionally, he is AV Preeminent peer review rated,\* the highest rating through Martindale-Hubbell.

This experience fills a unique niche in the legal market. We have developed successful strategies for some of the most complex and groundbreaking corporate audit cases in America. In sum, we have handled nearly every aspect of [SEC investigations](#), PCAOB investigations and securities litigation in dozens of different contexts.

### Representative Clients · Experience Serving As Local Co-Counsel For Large Firms

Some of our representative clients include:

- CVB Financial (Citizens Business Bank)
- Arthur Andersen LLP
- KPMG LLP
- Kabani & Company, Inc.
- MDC Acquisition Corp.
- RGH Enterprises, Inc.
- Tomy International, Inc.
- Small- and medium-sized companies
- Individuals, auditors, investment bankers and corporate executives

In addition to representing banks, accounting firms, auditors and corporate executives nationwide, we also serve as local co-counsel for large out-of-state law firms with cases in the Los Angeles area.

### **Contact VLG**

To learn more about our unique legal practice, [contact](#) lawyer Scott Vick of the Vick Law Group at 213-784-3657. Our office is centrally located in the Financial District of downtown Los Angeles, at the corner of South Flower Street and West 6th Street. We generally handle cases on an economical flat fee basis.

\*AV Preeminent and BV Distinguished are certification marks of Reed Elsevier Properties Inc., used in accordance with the Martindale-Hubbell certification procedures, standards and policies. Martindale-Hubbell is the facilitator of a peer review rating process. Ratings reflect the confidential opinions of members of the bar and the judiciary. Martindale-Hubbell ratings fall into two categories: legal ability and general ethical standards.

### **Vick Law Group APC**

800 West 6th Street, Suite 1220

Los Angeles, CA 90017

Phone: 213-784-3657

Fax: 213-784-6226

[Map and Directions](#)

Copyright © 2016 by [Vick Law Group APC](#). All rights reserved. [Disclaimer](#) | [Site Map](#)  
[Privacy Policy](#) | [Business Development Solutions](#) by [FindLaw](#), a Thomson Reuters business.

# EXHIBIT 13

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**  
**BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JAHN & ASSOCIATES, LLC

Petitioner,

v.

MELVIN N.A. AVANZADO,

Registrant/Respondent.

**CANCELLATION NO.: 92060029**

MARK: BIG FIRM EXPERIENCE,  
SMALL FIRM SERVICE  
(Registration Number: 4015965)

Filing Date: February 1, 2011

**DECLARATION OF MELVIN N.A. AVANZADO**

I, Melvin N.A. Avanzado, declare as follows:

1. I am an attorney-at-law and am licensed to practice law in the State of California. I am over 18 years of age. In July 2008, I founded The Avanzado Law Firm in which I am the principal. The Avanzado Law Firm is located in Los Angeles, California. I am licensed to practice law in California and am admitted to appear in all state and federal courts in California. I am not licensed to practice law in any other state. My practice focuses on civil litigation with an emphasis in entertainment, intellectual property, employment and other business litigation. With limited exceptions, my practice is limited to litigation in these areas. The Avanzado Law Firm has provided many clients with litigation services since its inception.

2. I have personal knowledge of the facts stated below, and if called to testify, could and would testify competently thereto.

3. I graduated cum laude from Notre Dame Law School in 1988.

Immediately after graduation I joined Latham & Watkins in September 1988 where I practiced general civil and employment litigation. At the time, Latham & Watkins was a big firm with hundreds of lawyers nationwide. Currently, Latham & Watkins has thousands of lawyers all over the world.

4. In 1993, I joined Christensen, White, Miller, Fink & Jacobs (later known as Christensen, White, Miller, Fink, Glaser & Shapiro LLP), which was another large firm. At this firm, my practice shifted focus to entertainment, media and intellectual property disputes.

5. In 1996, I left Christensen, White, Miller, Fink & Jacobs and co-founded White O'Connor Curry & Avanzado LLP – a boutique law firm in which I focused on entertainment, media, labor and intellectual property disputes.

6. In 2005, I became a partner in the Entertainment Practice Group of another large firm, Jeffer Mangels, Butler & Marmaro LLP. Jeffer Mangels over one hundred attorneys in its employ. There, I continued my civil litigation practice focusing on entertainment, intellectual property, employment and other business disputes.

7. My associate, Elaine W. Yu, is licensed to practice law in California. She is not licensed to practice law in any other state.

8. I have never received any phone call from a client or potential client who confused my firm with Jahn & Associates, LLC or its principal, Kirstin Jahn (collectively “Jahn”). I have never received any phone call from anyone who believed they were calling Jahn or any other attorney. I have never received any solicitation from anyone who has mistaken my firm with Jahn’s because of the tagline and service mark “Big Firm Experience ... Small Firm Service.” I have never been contacted by any client or potential client who mistakenly contacted

me but who instead was looking for Jahn. My firm and I have never been confused with Jahn or its principal lawyer(s).

9. In or about June 2009, I came up with the tag line for The Avanzado Law Firm, “Big Firm Experience, Small Firm Service” and used it in an advertisement for a bar event shortly thereafter. To this day, I have used this tag line on my firm’s website. My business cards contain the website for The Avanzado Law Firm and directs people to my firm’s website. Since at least this date, I have attended and continue to attend networking and business functions on a monthly basis with attorneys, businesspeople and other professionals. At such functions, I hand out my business card which directs recipients to The Avanzado Law Firm’s website. Attached as **Exhibit “14”** is a true and correct copy of the advertisement prototypes I came up with and used in connection with the bar event bates stamped MNAA\_TM\_000039-53 and produced in discovery on or about February 6, 2015.

10. In or about February 1, 2011, the Glenn Truitt of the law firm MyContractsGuy.com submitted my trademark application with the United States Patent and Trademark Office (“USPTO”), for the service mark “Big Firm Experience ... Small Firm Service” (the “Avanzado Mark).” The Avanzado Mark was intended to identify The Avanzado Law Firm’s litigation services. The Avanzado Mark was assigned serial number 85231879. The application stated that the first use of the Avanzado Mark was March 1, 2008, but this was a typographical error. The first use should have been in the year 2009. I did not realize the typographical error until this litigation. A true and correct copy of my trademark application is attached to the Notice of Reliance as Exhibit “2.”

11. On or about May 3, 2011, the USPTO approved the Avanzado Mark for publication and on or about July 7, 2011, the Avanzado Mark was published in the Trademark

Official Gazette. The notice of publication contained the following language: “Any party who believes it will be damaged by the registration of the mark may file a notice of opposition (or extension of time therefor) with the Trademark Trial and Appeal Board. If no party files an opposition or extension request within thirty (30) days after the publication date, then within twelve (12) weeks of the publication date a certificate of registration should issue.” No individual or entity – including Jahn filed an opposition to the Avanzado Mark. Attached as **Exhibit “15”** is a true and correct copy of the USPTO approval and notice of publication of the Avanzado Mark bates stamped MNAA\_TM\_000012-16 and produced in discovery on or about February 6, 2015.

12. On or about August 23, 2011, the Avanzado Mark became a registered service mark. A true and correct copy of this certificate of registration is attached to the Notice of Reliance as Exhibit “1.”

13. On or about June 24, 2014 – nearly three years after the Avanzado Mark was published in the Trademark Official Gazette – Jahn wrote to me that she was the owner of the mark “Small Firm, Big Experience” (the “Jahn Mark”). Attached as **Exhibit “16”** is a true and correct copy of Jahn’s June 24, 2014 letter to me bates stamped MNAA\_TM\_000020 and produced in discovery on or about February 6, 2015.

14. On or about September 23, 2014, Jahn filed the instant petition for cancellation of the Avanzado Mark on the ground that there is a “likelihood of confusion” between the Avanzado Mark and the Jahn Mark. A true and correct copy of Jahn’s cancellation petition is attached to the Notice of Reliance as Exhibit “6.”

15. On or about March 9, 2015, we received Jahn's responses to our first set of requests for admissions. A true and correct copy of Jahn's responses are attached to the Notice of Reliance as Exhibit "8."

16. On or about March 9, 2015, we received Jahn's responses to our first set of interrogatories. A true and correct copy of Jahn's responses are attached to the Notice of Reliance as Exhibit "9."

17. On or about June 3, 2015, we received Jahn's responses to our second set of interrogatories. A true and correct copy of Jahn's responses are attached to the Notice of Reliance as Exhibit "10."

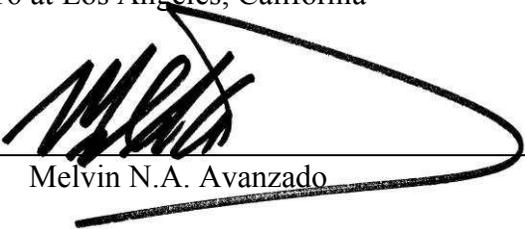
18. On May 26, 2016, I reviewed Jahn's website (<http://jahnlaw.com/>) for Jahn's experience and qualifications. According to Jahn's website, Jahn's practice areas include counseling and licensing, unspecified litigation, portfolio management, quality control, trademark application and registration, copyright application and registration, pro bono work and entertainment law consisting of negotiating and preparing agreements involving endorsement, product licensing, merchandising, film studio, publishing, radio, music, artist and model. Jahn's website shows that she maintains an office in Colorado state and an office in Nevada state. Jahn's website shows that Jahn is admitted to practice law in New York, Nevada and Colorado states. Jahn's website does not indicate Jahn's previous firm experience, nor whether she has any big law firm experience. True and correct copies of downloads of Jahn's website from May 26, 2016 are attached to the Notice of Reliance as **Exhibit "11."**

19. My cursory internet search on or about May 26, 2016 of the Avanzado Mark – and its variations – reveals that over a dozen law firms use a variation of the Avanzado

Mark or the Jahn Mark to market their legal services. True and correct copies of these websites are attached to the Notice of Reliance as **Exhibit “12.”**

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 27th day of May, 2016 at Los Angeles, California



Melvin N.A. Avanzado

# EXHIBIT 14

---

**From:** Melvin N.A. Avanzado  
**Sent:** Wednesday, June 10, 2009 12:44 PM  
**To:** P C  
**Subject:** RE: NAPABA Regional Conference - June 19/20

Hey this looks good. Delete the period at the end though.

MEL

---

Melvin N.A. Avanzado  
THE AVANZADO LAW FIRM  
1880 CENTURY PARK EAST  
TWELFTH FLOOR  
LOS ANGELES, CALIFORNIA 90067  
310.552.9300 TELEPHONE  
310.388.5330 FACSIMILE  
<[mel@avanzadolaw.com](mailto:mel@avanzadolaw.com)>  
[www.avanzadolaw.com](http://www.avanzadolaw.com)  
[www.entertainmentlitigationblog.com](http://www.entertainmentlitigationblog.com)

This e-mail message and any attachments are confidential and may be privileged attorney-client communications. This message is intended solely for the intended recipient hereof. Dissemination, distribution or copying of this message or attachments without proper authorization is strictly prohibited. If you are not the intended recipient, please notify us immediately by telephone or by e-mail, and permanently delete the original, and destroy all copies, of this message and all attachments.

**THE AVANZADO LAW FIRM**

1880 CENTURY PARK EAST • TWELFTH FLOOR  
LOS ANGELES, CALIFORNIA 90067  
310.552.9300 VOICE • 310.388.5330 FAX  
[www.avanzadolaw.com](http://www.avanzadolaw.com)  
[www.entertainmentlitigationblog.com](http://www.entertainmentlitigationblog.com)

---

**From:** P C [mailto:p2carino@yahoo.com]  
**Sent:** Wednesday, June 10, 2009 10:10 AM  
**To:** mel@avanzadolaw.com  
**Subject:** RE: NAPABA Regional Conference - June 19/20

heres the tag line on the ad, [REDACTED]

--- On Tue, 6/9/09, mel@avanzadolaw.com <mel@avanzadolaw.com> wrote:

From: mel@avanzadolaw.com <mel@avanzadolaw.com>  
Subject: RE: NAPABA Regional Conference - June 19/20  
To: "P C" <p2carino@yahoo.com>  
Date: Tuesday, June 9, 2009, 5:09 PM

The concept is that I can provide the experience of a lawyer at a big firm but with more personal/economic service. Or something about diversity -- like "You can have diversity without sacrificing quality" --> but that and everything I come up with is too heavy handed. And you can't play the economics too much, otherwise you come off as being the "cheap" guy -- not the brand I want either.

Maybe "Big firm experience, small firm service."

I think this needs more work than we have time for right now. But if you think of something . . . .

MEL

---

Melvin N.A. Avanzado

THE AVANZADO LAW FIRM

1880 CENTURY PARK EAST

TWELFTH FLOOR

LOS ANGELES, CALIFORNIA 90067

310.552.9300 TELEPHONE

310.388.5330 FACSIMILE

< [mel@avanzadolaw.com](mailto:mel@avanzadolaw.com) >

[www.avanzadolaw.com](http://www.avanzadolaw.com)

[www.entertainmentlitigationblog.com](http://www.entertainmentlitigationblog.com)

This e-mail message and any attachments are confidential and may be privileged attorney-client communications. This message is intended solely for the intended recipient hereof. Dissemination, distribution or copying of this message or attachments without proper authorization is strictly prohibited. If you are not the intended recipient, please notify us immediately by telephone or by e-mail, and permanently delete the original, and destroy all copies, of this message and all attachments.

**THE AVANZADO LAW FIRM**

1880 CENTURY PARK EAST • TWELFTH FLOOR  
LOS ANGELES, CALIFORNIA 90067  
310.552.9300 VOICE • 310.388.5330 FAX  
www.avanzadolaw.com  
www.entertainmentlitigationblog.com

---

**From:** P C [mailto:p2carino@yahoo.com]  
**Sent:** Tuesday, June 09, 2009 5:04 PM  
**To:** mel@avanzadolaw.com  
**Subject:** Re: NAPABA Regional Conference - June 19/20

give me all the things and i will think of it [REDACTED]

--- On Tue, 6/9/09, mel@avanzadolaw.com <mel@avanzadolaw.com> wrote:

From: mel@avanzadolaw.com <mel@avanzadolaw.com>  
Subject: Re: NAPABA Regional Conference - June 19/20  
To: "P C" <p2carino@yahoo.com>  
Date: Tuesday, June 9, 2009, 4:54 PM

That's just it. I can't think of a good one.

MEL

---

Melvin N.A. Avanzado  
The Avanzado Law Firm  
1880 Century Park East  
Twelfth Floor  
Los Angeles, California 90067  
310.552.9300 telephone  
310.388.5330 facsimile  
<mel@avanzadolaw.com>  
www.avanzadolaw.com  
www.entertainmentlitigationblog.com

This email message and any attachments are confidential and may be privileged attorney-client communications. This message is intended solely for the intended recipient(s). Dissemination, distribution or copying of this message or attachments without proper authorization is strictly prohibited. If you are not the intended recipient, please notify us immediately by telephone or by email and permanently delete

the original, and destroy all copies, of this message and all attachments.

Sent from my iPhone

On Jun 9, 2009, at 4:52 PM, "P C" <p2carino@yahoo.com> wrote:

> get me the tag line and i'll add it in there

>

> --- On Tue, 6/9/09, mel@avanzadolaw.com <mel@avanzadolaw.com> wrote:

>

> From: mel@avanzadolaw.com <mel@avanzadolaw.com>

> Subject: Re: NAPABA Regional Conference - June 19/20

> To: "P C" <p2carino@yahoo.com>

> Date: Tuesday, June 9, 2009, 4:40 PM

>

> Looks good. But can you do a version without the bottom copy? Need a

> better tag line.

>

> MEL

> \_\_\_\_\_

>

> Melvin N.A. Avanzado

> The Avanzado Law Firm

> 1880 Century Park East

> Twelfth Floor

> Los Angeles, California 90067

> 310.552.9300 telephone

> 310.388.5330 facsimile

> <mel@avanzadolaw.com/mc/compose?to=mel@avanzadolaw.com>>

> www.avanzadolaw.com

> www.entertainmentlitigationblog.com

>

> This email message and any attachments are confidential and may be

> privileged attorney-client communications. This message is intended

> solely for the intended recipient(s). Dissemination, distribution or

> copying of this message or attachments without proper authorization is

> strictly prohibited. If you are not the intended recipient, please

> notify us immediately by telephone or by email and permanently delete

> the original, and destroy all copies, of this message and all

> attachments.

>

> Sent from my iPhone

>

> On Jun 9, 2009, at 3:40 PM, "P C" <p2carino@yahoo.com/mc/compose?to=p2carino@yahoo.com

>> wrote:

>

>> how's this

>>

>> --- On Tue, 6/9/09, mel@avanzadolaw.com/mc/compose?to=mel@avanzadolaw.com

>>> <mel@avanzadolaw.com/mc/compose?to=mel@avanzadolaw.com>> wrote:

>>  
>> From: mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com> <mel@avanzadolaw.com  
>> </mc/compose?to=mel@avanzadolaw.com>>  
>> Subject: RE: NAPABA Regional Conference - June 19/20  
>> To: "P C" <p2carino@yahoo.com</mc/compose?to=p2carino@yahoo.com>>  
>> Date: Tuesday, June 9, 2009, 2:30 PM

>>  
>> The bottom copy should be: "THE AVANZADO LAW FIRM PROVIDES LARGE  
>> LAW FIRM EXPERIENCE AND SOPHISTICATED BUT WITH THE PERSONAL  
>> ATTENTION AND COST-EFFECTIVENESS THAT ONLY A SMALL FIRM CAN DELIVER"

>>  
>> That's what I'm calling the "tag line." I don't really like it, but  
>> I haven't come up with anything yet.

>>  
>> I want the margins of all copy narrowed. And two logos -- one for  
>> the Philippine American Bar Association and one for the PABA  
>> Foundation -- on each side just above your blue border. Each of the  
>> logos should be smaller than what you have already.

>>  
>> MEL

>> \_\_\_\_\_  
>>

>> Melvin N.A. Avanzado  
>> The Avanzado Law Firm  
>> 1880 Century Park East  
>> Twelfth Floor  
>> Los Angeles, California 90067  
>> 310.552.9300 telephone  
>> 310.388.5330 facsimile  
>> <mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com></mc/  
>> compose?to=mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>>>  
>> www.avanzadolaw.com<<http://www.avanzadolaw.com/>>  
>> www.entertainmentlitigationblog.com<<http://www.entertainmentlitigationblog.com/>>  
>>>

>>  
>> This e-mail message and any attachments are confidential and may be  
>> privileged attorney-client communications. This message is intended  
>> solely for the intended recipient hereof. Dissemination,  
>> distribution or copying of this message or attachments without  
>> proper authorization is strictly prohibited. If you are not the  
>> intended recipient, please notify us immediately by telephone or by  
>> e-mail, and permanently delete the original, and destroy all copies,  
>> of this message and all attachments.

>>  
>>  
[cid:1.393371516@web82704.mail.mud.yahoo.com</mc/compose?to=1.393371516@web82704.mail.mud.yahoo.com  
>> >]

>>  
>> From: P C [mailto:p2carino@yahoo.com</mc/compose?to=p2carino@yahoo.com  
>> >]  
>> Sent: Tuesday, June 09, 2009 2:26 PM

>> To: mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>

>> Subject: RE: NAPABA Regional Conference - June 19/20

>>

>> Mel,

>> I think its better you write what your wrote so i can make some  
>> sense of it- I am lost on some of what you want done. I have the  
>> right logo and played around with the main content but the secondary  
>> information i need you to write it out and let me work on it

>>

>>

>>

>> --- On Tue, 6/9/09, mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com

>> > <mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>> wrote:

>>

>> From: mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com> <mel@avanzadolaw.com

>> </mc/compose?to=mel@avanzadolaw.com>>

>> Subject: RE: NAPABA Regional Conference - June 19/20

>> To: "P C" <p2carino@yahoo.com</mc/compose?to=p2carino@yahoo.com>>

>> Date: Tuesday, June 9, 2009, 11:54 AM

>> Here is the markup. Hopefully you can read my handwriting. And I  
>> have questions on the font/prominence issues -- and let me know of  
>> what you think of the "tag line." I need a tag line for the firm.

>> Not sure this is it though.

>>

>> MEL

>>

>>

>> Melvin N.A. Avanzado

>> The Avanzado Law Firm

>> 1880 Century Park East

>> Twelfth Floor

>> Los Angeles, California 90067

>> 310.552.9300 telephone

>> 310.388.5330 facsimile

>> <mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>>

>> www.avanzadolaw.com<<http://www.avanzadolaw.com/>>

>> www.entertainmentlitigationblog.com<<http://www.entertainmentlitigationblog.com/>

>>>

>>

>> This e-mail message and any attachments are confidential and may be  
>> privileged attorney-client communications. This message is intended  
>> solely for the intended recipient hereof. Dissemination,  
>> distribution or copying of this message or attachments without  
>> proper authorization is strictly prohibited. If you are not the  
>> intended recipient, please notify us immediately by telephone or by  
>> e-mail, and permanently delete the original, and destroy all copies,  
>> of this message and all attachments.

>>

>>

[cid:1.393371516@web82704.mail.mud.yahoo.com</mc/compose?to=1.393371516@web82704.mail.mud.yahoo.com

>> >]

>>  
>> From: P C [mailto:p2carino@yahoo.com</mc/compose?to=p2carino@yahoo.com  
>> >]  
>> Sent: Tuesday, June 09, 2009 11:53 AM  
>> To: mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>  
>> Subject: RE: NAPABA Regional Conference - June 19/20  
>>  
>> coolio  
>>  
>> --- On Tue, 6/9/09, mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com  
>> > <mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>> wrote:  
>>  
>> From: mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com> <mel@avanzadolaw.com  
>> </mc/compose?to=mel@avanzadolaw.com>>  
>> Subject: RE: NAPABA Regional Conference - June 19/20  
>> To: "P C" <p2carino@yahoo.com</mc/compose?to=p2carino@yahoo.com>>  
>> Date: Tuesday, June 9, 2009, 11:39 AM  
>> Okay. I'll scan with my comments.

>>  
>> MEL

>> \_\_\_\_\_  
>>

>> Melvin N.A. Avanzado  
>> The Avanzado Law Firm  
>> 1880 Century Park East  
>> Twelfth Floor  
>> Los Angeles, California 90067  
>> 310.552.9300 telephone  
>> 310.388.5330 facsimile  
>> <mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>>  
>> www.avanzadolaw.com<<http://www.avanzadolaw.com/>>  
>> www.entertainmentlitigationblog.com<<http://www.entertainmentlitigationblog.com/>>  
>>>

>>  
>> This e-mail message and any attachments are confidential and may be  
>> privileged attorney-client communications. This message is intended  
>> solely for the intended recipient hereof. Dissemination,  
>> distribution or copying of this message or attachments without  
>> proper authorization is strictly prohibited. If you are not the  
>> intended recipient, please notify us immediately by telephone or by  
>> e-mail, and permanently delete the original, and destroy all copies,  
>> of this message and all attachments.

>>  
>>  
[cid:1.393371516@web82704.mail.mud.yahoo.com</mc/compose?to=1.393371516@web82704.mail.mud.yahoo.com  
>> >]  
>>

>> From: P C [mailto:p2carino@yahoo.com</mc/compose?to=p2carino@yahoo.com  
>> >]  
>> Sent: Tuesday, June 09, 2009 11:37 AM  
>> To: mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>

>> Subject: RE: NAPABA Regional Conference - June 19/20

>>

>> [REDACTED] i can work on it later?

>>

>> --- On Tue, 6/9/09, mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com

>> > <mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>> wrote:

>>

>> From: mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com> <mel@avanzadolaw.com

>> </mc/compose?to=mel@avanzadolaw.com>>

>> Subject: RE: NAPABA Regional Conference - June 19/20

>> To: "P C" <p2carino@yahoo.com</mc/compose?to=p2carino@yahoo.com>>

>> Date: Tuesday, June 9, 2009, 11:27 AM

>> [REDACTED] I'd like to play with the margins but I have

>> to show you. The zip folder I gave you has the Foundation logo --

>> it has the same star but the words are different. And here's a

>> better Bar Association logo. I think the logos should be smaller

>> too.

>>

>> MEL

>>

>>

>> Melvin N.A. Avanzado

>> The Avanzado Law Firm

>> 1880 Century Park East

>> Twelfth Floor

>> Los Angeles, California 90067

>> 310.552.9300 telephone

>> 310.388.5330 facsimile

>> <mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>>

>> www.avanzadolaw.com<<http://www.avanzadolaw.com/>>

>> www.entertainmentlitigationblog.com<<http://www.entertainmentlitigationblog.com/>>

>>>

>>

>> This e-mail message and any attachments are confidential and may be

>> privileged attorney-client communications. This message is intended

>> solely for the intended recipient hereof. Dissemination,

>> distribution or copying of this message or attachments without

>> proper authorization is strictly prohibited. If you are not the

>> intended recipient, please notify us immediately by telephone or by

>> e-mail, and permanently delete the original, and destroy all copies,

>> of this message and all attachments.

>>

>>

[cid:1.393371516@web82704.mail.mud.yahoo.com</mc/compose?to=1.393371516@web82704.mail.mud.yahoo.com

>> >]

>>

>> From: P C [mailto:p2carino@yahoo.com</mc/compose?to=p2carino@yahoo.com

>> >]

>> Sent: Tuesday, June 09, 2009 11:23 AM

>> To: mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>

>> Subject: RE: NAPABA Regional Conference - June 19/20

>>  
>> How's this? I don't have the bar logo just this from the zipped  
>> folder you gave me  
>>  
>> --- On Mon, 6/8/09, mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com  
>> > <mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>> wrote:  
>>  
>> From: mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com> <mel@avanzadolaw.com  
>> </mc/compose?to=mel@avanzadolaw.com>>  
>> Subject: RE: NAPABA Regional Conference - June 19/20  
>> To: "P C" <p2carino@yahoo.com</mc/compose?to=p2carino@yahoo.com>>  
>> Date: Monday, June 8, 2009, 8:54 PM  
>> I know. Sorry. I've been distracted/swamped.  
>>  
>> Okay, it has to be black and white. Attached are PABA Foundation  
>> logos. You have the bar association logo. I think I want a small  
>> Bar Association logo and Foundation logo on each side. The content  
>> should be:  
>>  
>> "Melvin N.A. Avanzado, President and CEO of The PABA Foundation and  
>> member of the Board of Governors of the Philippine American Bar  
>> Association, congratulates NAPABA on its 2009 California-Nevada  
>> Regional Conference." -- prominent font/type  
>>  
>> then underneath that in less prominent font:  
>>  
>> "The Avanzado Law Firm delivers the sophistication and expertise  
>> from 20 years of practice with large law firms but with the personal  
>> attention and cost-effectiveness of a small firm."  
>>  
>> MEL  
>> \_\_\_\_\_  
>>  
>> Melvin N.A. Avanzado  
>> The Avanzado Law Firm  
>> 1880 Century Park East  
>> Twelfth Floor  
>> Los Angeles, California 90067  
>> 310.552.9300 telephone  
>> 310.388.5330 facsimile  
>> <mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>>  
>> www.avanzadolaw.com<<http://www.avanzadolaw.com/>>  
>> www.entertainmentlitigationblog.com<<http://www.entertainmentlitigationblog.com/>>  
>>>  
>>  
>> This e-mail message and any attachments are confidential and may be  
>> privileged attorney-client communications. This message is intended  
>> solely for the intended recipient hereof. Dissemination,  
>> distribution or copying of this message or attachments without  
>> proper authorization is strictly prohibited. If you are not the  
>> intended recipient, please notify us immediately by telephone or by

>> e-mail, and permanently delete the original, and destroy all copies,  
>> of this message and all attachments.  
>>  
>>  
[cid:1.393371516@web82704.mail.mud.yahoo.com</mc/compose?to=1.393371516@web82704.mail.mud.yahoo.com  
>> >]  
>>  
>> From: P C [mailto:p2carino@yahoo.com</mc/compose?to=p2carino@yahoo.com  
>> >]  
>> Sent: Monday, June 08, 2009 12:32 PM  
>> To: mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>  
>> Subject: RE: NAPABA Regional Conference - June 19/20  
>>  
>> waiting for it if you want me to meet your deadline i need it ASAP  
>>  
>> --- On Wed, 6/3/09, mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com  
>> > <mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>> wrote:  
>>  
>> From: mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com> <mel@avanzadolaw.com  
>> </mc/compose?to=mel@avanzadolaw.com>>  
>> Subject: RE: NAPABA Regional Conference - June 19/20  
>> To: "P C" <p2carino@yahoo.com</mc/compose?to=p2carino@yahoo.com>>  
>> Date: Wednesday, June 3, 2009, 4:23 PM  
>> I'll write it tonight.  
>>  
>> MEL  
>> \_\_\_\_\_  
>>  
>> Melvin N.A. Avanzado  
>> The Avanzado Law Firm  
>> 1880 Century Park East  
>> Twelfth Floor  
>> Los Angeles, California 90067  
>> 310.552.9300 telephone  
>> 310.388.5330 facsimile  
>> <mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>>  
>> www.avanzadolaw.com<<http://www.avanzadolaw.com/>>  
>> www.entertainmentlitigationblog.com<<http://www.entertainmentlitigationblog.com/>>  
>>>  
>>  
>> This e-mail message and any attachments are confidential and may be  
>> privileged attorney-client communications. This message is intended  
>> solely for the intended recipient hereof. Dissemination,  
>> distribution or copying of this message or attachments without  
>> proper authorization is strictly prohibited. If you are not the  
>> intended recipient, please notify us immediately by telephone or by  
>> e-mail, and permanently delete the original, and destroy all copies,  
>> of this message and all attachments.  
>>  
>>  
[cid:1.393371516@web82704.mail.mud.yahoo.com</mc/compose?to=1.393371516@web82704.mail.mud.yahoo.com

>> >]  
>>  
>> From: P C [mailto:p2carino@yahoo.com</mc/compose?to=p2carino@yahoo.com  
>> >]  
>> Sent: Wednesday, June 03, 2009 12:33 PM  
>> To: mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>  
>> Subject: RE: NAPABA Regional Conference - June 19/20  
>>  
>> need the content you want  
>>  
>> --- On Tue, 6/2/09, mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com  
>> > <mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>> wrote:  
>>  
>> From: mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com> <mel@avanzadolaw.com  
>> </mc/compose?to=mel@avanzadolaw.com>>  
>> Subject: RE: NAPABA Regional Conference - June 19/20  
>> To: "p2carino@yahoo.com</mc/compose?to=p2carino@yahoo.com>" <p2carino@yahoo.com  
>> </mc/compose?to=p2carino@yahoo.com>>  
>> Date: Tuesday, June 2, 2009, 5:39 PM  
>> Percy,  
>>  
>> I need another ad please. Here's the one you did for the PABA  
>> dinner. Can we replace the right side with other content. I  
>> welcome your ideas.  
>>  
>> I need something next week if you can. Let me know.  
>>  
>> MEL  
>> \_\_\_\_\_  
>>  
>> Melvin N.A. Avanzado  
>> The Avanzado Law Firm  
>> 1880 Century Park East  
>> Twelfth Floor  
>> Los Angeles, California 90067  
>> 310.552.9300 telephone  
>> 310.388.5330 facsimile  
>> <mel@avanzadolaw.com</mc/compose?to=mel@avanzadolaw.com>>  
>> www.avanzadolaw.com<<http://www.avanzadolaw.com/>>  
>> www.entertainmentlitigationblog.com<<http://www.entertainmentlitigationblog.com/>>  
>>>  
>>  
>> This e-mail message and any attachments are confidential and may be  
>> privileged attorney-client communications. This message is intended  
>> solely for the intended recipient hereof. Dissemination,  
>> distribution or copying of this message or attachments without  
>> proper authorization is strictly prohibited. If you are not the  
>> intended recipient, please notify us immediately by telephone or by  
>> e-mail, and permanently delete the original, and destroy all copies,  
>> of this message and all attachments.  
>>

>>  
[cid:1.393371516@web82704.mail.mud.yahoo.com</mc/compose?to=1.393371516@web82704.mail.mud.yahoo.com  
>> >]

[REDACTED]

[REDACTED]



## THE AVANZADO LAW FIRM

1880 Century Park East

12th Floor

Los Angeles, California 90067

310.552.9300 Voice 310.388.5330 Fax

[www.avanzadolaw.com](http://www.avanzadolaw.com)

[www.entertainmentlitigationblog.com](http://www.entertainmentlitigationblog.com)

MNAA\_TM\_000052



Melvin N.A. Avanzado, President and CEO of The PABA Foundation and member of the Board of Governors of the Philippine American Bar Association, congratulates NAPABA on its 2009 California-Nevada Regional Conference.



PHILIPPINE AMERICAN  
BAR ASSOCIATION

BIG FIRM EXPERIENCE, SMALL FIRM SERVICE



THE PABA FOUNDATION



p2c : branding & marketing

## THE AVANZADO LAW FIRM

1880 Century Park East

12th Floor

Los Angeles, California 90067

310.552.9300 Voice 310.388.5330 Fax

[www.avanzadolaw.com](http://www.avanzadolaw.com)

[www.entertainmentlitigationblog.com](http://www.entertainmentlitigationblog.com)

MNAA\_TM\_000053



Melvin N.A. Avanzado, President and CEO of The PABA Foundation and member of the Board of Governors of the Philippine American Bar Association, congratulates NAPABA on its 2009 California-Nevada Regional Conference.



THE AVANZADO LAW FIRM DELIVERS THE SOPHISTICATION AND EXPERTISE FROM 20 YEARS OF PRACTICE WITH LARGE LAW FIRMS BUT WITH THE PERSONAL ATTENTION AND COST-EFFECTIVENESS OF A SMALL FIRM.

PHILIPPINE AMERICAN  
BAR ASSOCIATION



p2c : branding & marketing

# EXHIBIT 15

## Trademark Snap Shot Publication Stylesheet

(Table presents the data on Publication Approval)

### OVERVIEW

SERIAL NUMBER	85231879	FILING DATE	02/01/2011
REG NUMBER	0000000	REG DATE	N/A
REGISTER	PRINCIPAL	MARK TYPE	SERVICE MARK
INTL REG #	N/A	INTL REG DATE	N/A
TM ATTORNEY	WIENER, MICHAEL A	L.O. ASSIGNED	108

### PUB INFORMATION

RUN DATE	05/04/2011		
PUB DATE	N/A		
STATUS	680-APPROVED FOR PUBLICATON		
STATUS DATE	05/03/2011		
LITERAL MARK ELEMENT	BIG FIRM EXPERIENCE...SMALL FIRM SERVICE		
DATE ABANDONED	N/A	DATE CANCELLED	N/A
SECTION 2F	NO	SECTION 2F IN PART	NO
SECTION 8	NO	SECTION 8 IN PART	NO
SECTION 15	NO	RE PUB 12C	N/A
RENEWAL FILED	NO	RENEWAL DATE	N/A
DATE AMEND REG	N/A		

### FILING BASIS

FILED BASIS		CURRENT BASIS		AMENDED BASIS	
1 (a)	YES	1 (a)	YES	1 (a)	NO
1 (b)	NO	1 (b)	NO	1 (b)	NO
44D	NO	44D	NO	44D	NO
44E	NO	44E	NO	44E	NO
66A	NO	66A	NO		
NO BASIS	NO	NO BASIS	NO		

### MARK DATA

STANDARD CHARACTER MARK	YES
LITERAL MARK ELEMENT	BIG FIRM EXPERIENCE...SMALL FIRM SERVICE

MARK DRAWING CODE	4-STANDARD CHARACTER MARK
COLOR DRAWING FLAG	NO

**CURRENT OWNER INFORMATION**

PARTY TYPE	10-ORIGINAL APPLICANT
NAME	Melvin N.A. Avanzado
ADDRESS	1880 Century Park East; Suite 1404 Los Angeles, CA 90067
ENTITY	19-SOLE PROPRIETORSHIP
CITIZENSHIP	California
DBA/AKA	DBA The Avanzado Law Firm
COMPOSED OF	Melvin N.A. Avanzado - U.S. Citizen

**GOODS AND SERVICES**

INTERNATIONAL CLASS	045
DESCRIPTION TEXT	Litigation services

**GOODS AND SERVICES CLASSIFICATION**

INTERNATIONAL CLASS	045	FIRST USE DATE	03/01/2008	FIRST USE IN COMMERCE DATE	03/01/2008	CLASS STATUS	6-ACTIVE
---------------------	-----	----------------	------------	----------------------------	------------	--------------	----------

**MISCELLANEOUS INFORMATION/STATEMENTS**

CHANGE IN REGISTRATION	NO
------------------------	----

**PROSECUTION HISTORY**

DATE	ENT CD	ENT TYPE	DESCRIPTION	ENT NUM
05/03/2011	CNSA	O	APPROVED FOR PUB - PRINCIPAL REGISTER	004
04/29/2011	DOCK	D	ASSIGNED TO EXAMINER	003
02/07/2011	NWOS	I	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	002
02/04/2011	NWAP	I	NEW APPLICATION ENTERED IN TRAM	001

**CURRENT CORRESPONDENCE INFORMATION**

ATTORNEY	Glenn Truitt
CORRESPONDENCE ADDRESS	GLENN TRUITT MYCONTRACTSGUY.COM

	PO BOX 5153815539 LOS ANGELES, CA
DOMESTIC REPRESENTATIVE	NONE

**BIG FIRM  
EXPERIENCE...SMALL FIRM  
SERVICE**

**From:** TMOfficialNotices@USPTO.GOV  
**Sent:** Tuesday, June 7, 2011 00:36 AM  
**To:** glenn@mycontractsguy.com  
**Subject:** Official USPTO Notice of Publication: Serial Number 85231879

---

## NOTICE OF PUBLICATION

**Serial Number:** 85-231,879  
**Mark:** BIG FIRM EXPERIENCE...SMALL FIRM SERVICE(STANDARD CHARACTER MARK)  
**International Class(es):** 045  
**Applicant:** Melvin N.A. Avanzado  
**Attorney Reference Number:**

The mark identified above has been published in the *Trademark Official Gazette* (OG) on Jun 07, 2011. Any party who believes it will be damaged by the registration of the mark may file a notice of opposition (or extension of time therefor) with the Trademark Trial and Appeal Board. If no party files an opposition or extension request within thirty (30) days after the publication date, then within twelve (12) weeks of the publication date a certificate of registration should issue.

On the publication date or shortly thereafter, the applicant should carefully review the information that appears in the OG for accuracy (see steps, *below*). If any information is incorrect, the applicant should immediately email the requested correction to **TMPostPubQuery@uspto.gov**. For general information about this notice, please contact the Trademark Assistance Center at 1-800-786-9199.

1. Click on the following link or paste the URL into an internet browser:  
[http://www.uspto.gov/web/trademarks/tmog/20110607\\_OG.pdf#page=1](http://www.uspto.gov/web/trademarks/tmog/20110607_OG.pdf#page=1)
2. Wait for the total OG to download completely (as indicated on bottom of OG page).
3. At the top/side of the displayed page, click wherever the "binoculars" icon appears.
4. Enter in the "search" box the name of the applicant (for individual: last name, first name) or the serial number in this exact format (with hyphen and comma): 85-231,879, e.g.
5. View the retrieved result(s). If multiple results appear in the "results" box, click directly on each "search term" shown in the box to access all separate appearances in the OG.

# EXHIBIT 16

# JAHN & ASSOCIATES, LLC

KIRSTIN M. JAHN

INTELLECTUAL PROPERTY LAW

Small Firm, Big Experience®

Licensed in:  
New York  
Nevada  
Colorado

COLORADO

1942 Broadway  
Suite 314  
Boulder, CO 80302  
Tel: 303 545 -5128

Nevada

200 S. Virginia Street  
8<sup>th</sup> Floor  
Reno, NV 89501  
Tel: 775 771 3462

June 24, 2014

June 24, 2014

Melvin Avanzado  
The Avanzado Law Firm  
1880 Century Park East, Suite 1404  
Los Angeles, CA 90067

Re: Small Firm, Big Experience Registration No. 3642830

Dear Mr. Avanzado:

Please be advised that my firm owns the above referenced trademark for use in connection with legal services. Since at least 2001, Jahn & Associates has been using that mark in marketing, advertising and on our website.

Recently, it came to my attention that your firm has received a registration on the trademark BIG FIRM EXPERIENCE... SMALL FIRM SERVICE for litigation services. Because your mark is very similar to mine, the services are the same and we market in the trade channels, and in the same territory, a significant potential for customer confusion exists between the two marks. Accordingly, at this time, we request that you cease and desist from use of your mark BIG FIRM EXPERIENCE... SMALL FIRM SERVICE and abandon your trademark registration.

In view of the seriousness of this matter, we look forward to receiving your assurances that you will comply with our request within ten (10) days of the date of this letter. Please note that this is not a complete and exhaustive statement of our rights, claims, or intentions.

Sincerely,  
**JAHN & ASSOCIATES, LLC**

s/Kirstin M. Jahn  
Kirstin@jahnlaw.com

MNAA\_TM\_000020

# EXHIBIT 17

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**  
**BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JAHN & ASSOCIATES, LLC

Petitioner,

v.

MELVIN N.A. AVANZADO,

Registrant/Respondent.

**CANCELLATION NO.: 92060029**

MARK: BIG FIRM EXPERIENCE,  
SMALL FIRM SERVICE  
(Registration Number: 4015965)

Filing Date: February 1, 2011.

**DECLARATION OF KELLY D. TALCOTT**

I, Kelly D. Talcott, declare as follows:

1. I am an attorney-at-law and am licensed to practice law in the State of New York. I am over 18 years of age. I have personal knowledge of the facts stated below, and if called to testify, could and would testify competently thereto.

2. I practice law through my law firm, The Talcott Law Firm, PC. I maintain a website for my firm: [www.kdtalcott.com](http://www.kdtalcott.com). In my website, I have one page entitled "What I Can Do For You." On that page, I use a tag line, "Big Firm Skills. Small Firm Service." I have had this tag line on my website since at least 2009.

3. I have never been contacted by any client or potential client who mistakenly contacted me but who instead was looking for The Avanzado Law Firm or Jahn & Associates, LLC. My firm and I have never been confused with either of those two law firms or their principal lawyers.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 21 day of April, 2016 at Sea Cliff, New York

  
\_\_\_\_\_  
Kelly D. Talcott

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age  
3 of 18 years and am not a party to the within action. My business address is 1880 Century Park East,  
4 Suite 1100, Los Angeles, California 90067. On the date set forth below, I caused the foregoing  
document(s) described as

5 **DECLARATION OF KELLY D. TALCOTT IN SUPPORT OF RESPONDENT AND**  
6 **DEFENDANT MELVIN N.A. AVANZADO’S MOTION FOR SUMMARY**  
**JUDGMENT**

7 to be served on the interested parties in this action as follows by placing  
8  the original  a true copy thereof enclosed in sealed envelopes addressed as stated below:

9 Kirstin M. Jahn  
10 Jahn & Associates, LLC  
11 1942 Broadway, Suite 314  
Boulder, Colorado 80304  
<kirstin@jahnlaw.com>

12  **BY MAIL:** I sealed and placed such envelope for collection and mailing to be deposited in  
13 the mail on the same day in the ordinary course of business at Los Angeles, California. The  
14 envelope was mailed with postage thereon fully prepaid. I am readily familiar with this firm's  
practice of collecting and processing correspondence for mailing. It is deposited with the  
U.S. Postal Service on that same day in the ordinary course of business.

15  **BY OVERNIGHT COURIER:** I caused such envelope to be placed for collection and  
16 delivery on this date in accordance with standard \_\_\_\_\_ delivery procedures.

17  **BY FAX:** In addition to service by mail, I transmitted a copy of the foregoing document(s)  
18 this date via telecopier to the facsimile numbers shown above.

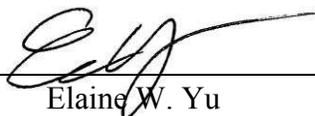
19  **BY ELECTRONIC MAIL:** I personally delivered such envelope by electronic mail to the  
20 addressee(s) shown above.

21  **BY PERSONAL SERVICE:** I personally delivered such envelope by hand to the  
22 addressee(s) shown above.

23  [State] I declare under penalty of perjury under the laws of the State of California that the  
24 above is true and correct.

25  [Federal] I declare that I am employed in the office of a member of the Bar of this Court at  
26 whose direction the service was made. I declare under penalty of perjury that the  
27 foregoing is true and correct.

28 Executed on April 22, 2016 at Los Angeles, California.

  
Elaine W. Yu